

CITY OF YUBA CITY
STAFF REPORT

Date: August 18, 2020
To: Honorable Mayor & Members of the City Council
From: Development Services Department
Presentation By: Benjamin Moody, Development Services Director

Summary

Subject: Community Development Block Grant (CDBG) 2020-2024 Consolidated Plan, 2020-2021 Annual Action Plan, and Analysis of Impediments to Fair Housing Choice

Recommendation: A. Conduct a Public Hearing to receive comments on the 2020-2024 Consolidated Plan, 2020-2021 Action Plan, and Analysis of Impediments to Fair Housing Choice; and after consideration

B. Adopt a Resolution approving and authorizing staff to submit the required documentation to the Department of Housing and Urban Development (HUD), on the proposed Analysis of Impediments to Fair Housing Choice, 2020-2024 Consolidated Plan, and 2020-2021 Annual Action which allocates \$666,861 in CDBG funds.

C. Approve staff moving forward with preparing and accepting applications for CARES Act CDBG-CV funding, and appointing two Councilmembers to participate on an *ad hoc* CDBG-CV Review and Recommendation Committee.

Fiscal Impact: \$666,861 from 2020-2021 CDBG Allocation

Purpose:

To provide decent housing, a suitable living environment, and to expand economic opportunities primarily for low- and moderate-income persons by allocation of the City of Yuba City's 2020-2021 CDBG funds, approving the 2020-2024 Consolidated Plan, and Analysis of Impediments to Fair Housing Choice.

Background:

The City is an entitlement jurisdiction in the Community Development Block Grant (CDBG) program and receives an annual allocation of funds from the Department of Housing and Urban Development (HUD). HUD requires entitlement jurisdictions to complete a Five-Year Consolidated Plan in order to receive CDBG funds. Cities are obligated to spend their funds in accordance with the priority needs identified in their Consolidated Plan. The City's most recent Consolidated Plan expired June 30, 2020. Therefore, a new Consolidated Plan has been developed to comply with HUD's requirements. HUD also requires the City prepare an Action Plan that describes how the annual allocation of CDBG funds will be utilized to address the needs identified in the Five-Year Consolidated Plan. Additionally, the City must also have in

place a Citizen Participation Plan that governs the City’s outreach efforts for all matters pertaining to the CDBG program.

At the regular City Council meeting held June 18, 2020, staff presented the CDBG recommendation to Council for approval. After discussion, and consideration of the economic impacts to the City related to the COVID-19 pandemic, staff was asked to look into coordinating with City departments to confirm if existing needs can be met through the utilization of this funding source, particularly related to recent needs at the fire stations; Fire Station 1 to assist with unplanned roof replacement, or ADA modifications at Fire Station 2.

Staff reviewed the applicability of the funds for potential City needs, and coordinated with the Fire Department and HUD on potential applications. Due to the immediate need to replace the roof, CDBG funding was not available in a timely manner. Additionally, due to Fire Station 2 not being in a HUD determined low income census tract, the proposed ADA improvements would not qualify under HUD regulations. In order to be eligible, the activity needs to meet a national objective:

- Benefit to low- and moderate- income (LMI) persons;
- Aid in the prevention or elimination of slums or blight;
- Meet a need having a particular urgency.

Staff has been in communication with HUD to determine if the City is eligible to use CDBG-CV funding to create a room, or new accessory buildings, for firemen to use as a COVID-19 decontamination area for cleaning and storing associated equipment. If the proposed Fire Stations are in a low-mod residential area, it will meet both requirements (eligible activity and a national objective).

Analysis:

2020-2024 Consolidated Plan: (Attachment 2)

While the structure of the Consolidated Plan is dictated by HUD, development of the Consolidated Plan is a collaborative process designed to identify the community’s needs with regard to decent, affordable housing, suitable living environments, and the expansion of economic opportunity for low- and moderate-income residents. Income qualifications are based on the Yuba City Metropolitan Statistical Area (MSA) and are updated every year. The 2019 Yuba City MSA income limits are as follows:

Yuba City MSA 2019							
Median Income	Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person
\$59,500	Extremely Low (30%)	\$13,650	\$16,910	\$21,330	\$25,750	\$30,170	\$34,590
	Very Low (50%)	\$22,700	\$25,950	\$29,200	\$32,400	\$35,000	\$37,600
	Low (80%)	\$36,300	\$41,500	\$46,700	\$51,850	\$56,000	\$60,150

The City’s CDBG consultant, Stuart Consulting, worked with City staff to contact and solicit input from public and private service providers, City departments, and hold community meetings. The outreach effort ensured that members of the community (particularly low- and moderate-income residents) had ample opportunities to shape the priorities of the Consolidated Plan.

The Consolidated Plan identifies the community's most urgent needs based upon the Needs Assessment, Market Analysis sections of the Consolidated Plan and input received during the citizen participation process. Then the Strategic Plan section of the Consolidated Plan sets forth a Plan for addressing the priority needs utilizing CDBG funds and any other resources available during the five-year planning period. Although the priorities of the proposed Plan are similar to those of the prior Plan, the City's proposed 2020-2024 Consolidated Plan presents the priority needs in accordance with the HUD required format. The following table shows the priority needs identified in the Consolidated Plan organized by the corresponding HUD category:

HUD Category	Priority Need	Description
Housing	Affordable Rental Housing	Increase the availability of affordable rental housing. Construction, acquisition and/or rehabilitation of affordable rental housing, including public housing.
Housing	Rehabilitation of Existing Housing	Preserve existing housing stock. Provide assistance for correction of health and safety defects, home repairs and accessibility modifications.
Housing	Construction of Affordable Housing	Provide assistance and support applications for development of affordable housing units.
Public Services	Homeless Housing and Supportive Services	Provide assistance to the Sutter-Yuba Homeless Consortium and its member agencies for housing and supportive services.
Public Services	Housing and Supportive Services for Special Needs Populations	Provide assistance to non-profit agencies that provide housing assistance and supportive services to non-homeless, special needs populations. (Seniors, disabled, etc.)
Infrastructure	Public Improvements and Infrastructure	Projects located in lower income neighborhoods, including ADA accessibility improvements, lighting, parks and neighborhood clean-up.
Public Facilities	Public Facility Construction/Rehabilitation	Construction or rehabilitation of public facilities including senior centers, youth centers, centers for the disabled, homeless facilities.
Economic Development	Economic Development Opportunities	Provide economic development assistance to businesses that create jobs or otherwise benefit low income persons through the provision of education or job training.

The Consolidated Plan recognizes that needs far exceed the funding available and not all needs can be addressed during the period covered by the Consolidated Plan.

In general, the City will allocate investment of resources on a city-wide basis. The distribution of funding is predicated somewhat on the nature of the activity to be funded. Resources targeted to new construction and preservation of existing housing will be allocated on a city-wide basis. Resources targeted to special needs populations, including homeless, will also be allocated on a city-wide basis, where needs are identified and/or where resources can be coordinated with existing facilities and services. Activities such as public facilities and improvements will be targeted to older, low-income neighborhoods most in need of assistance (qualified low/mod census tracts). Economic development activities will be targeted to business districts located in qualified low-income areas, industrial parks and commercial sites in various City locations, primarily in the qualified low/mod census tracts.

2020-2021 Action Plan: (Included in Consolidated Plan, Attachment 2)

The 2020-2021 Action Plan contains next year’s budget for CDBG projects that address the priority needs identified in the Consolidated Plan and is the first year Action Plan for the 2020-2024 Consolidated Plan. HUD has notified the City the CDBG allocation for the 2020-2021 Program Year will be \$666,861. In accordance with HUD regulations, twenty percent (\$133,372) of the allocation can be utilized for administration costs; an amount not to exceed fifteen percent (\$100,029) can be allocated to public service activities; and, the remaining sixty-five percent (\$433,460) is allocated to general projects and/or programs.

In compliance with citizen participation requirements, City staff held a public meeting on February 19, 2020 to encourage public input into the development of the Action Plan, and provide potential CDBG applicants an overview of the application and scoring process. The City received six applications, resulting in funding requests in the amount of \$490,000.

Applications for funding were evaluated based on several factors, including the priority needs identified in the Consolidated Plan, the capacity of the applicant to administer the grant funds, readiness, and if applicable, timeliness of expenditures of past CDBG grants.

The proposed funding is based off of available funds, programs, and applications received for the funding that was compiled in March and a public notice was published in May. Staff recognizes needs may have changed in priority since March, and through Council review and the public hearing process can modify final allocation amount.

Below is a breakdown of the recommended projects and programs to be funded with 2020/2021 funding. Program Administration and Public Services have maximum limits; however, housing programs and public facility projects can be altered at desired levels for project funding:

Agency/Project	Recommended Funding	Description
Program Administration (20%)	\$ 133,372.00	General administration, oversight and management of Community Development Block Grant program. Funding covers salary cost for staff, and consultant services

Sutter-Yuba Homeless Consortium (15%)	\$ 100,000.00	<p>The Sutter-Yuba Homeless Consortium, in collaboration with Hands of Hope, Bridges to Housing, The Salvation Army, Central Valley Homeless Veterans Assistance Program and Sutter County Homeless Shelter provide services to the homeless population in Sutter and Yuba Counties. In addition, it will be acting as the lead agency and fiscal agent in providing services and programs, in conjunction with other non-profit agencies, to the City's homeless population. There is ongoing discussion regarding the Executive Director salary and final distribution of sub-recipient funding. The below allocation is subject to change:</p> <p>Consultant Services: \$15,276 for the continued work of the CoC Coordinator</p> <p>Coordinated Entry Front Desk: \$7,635 for the salary of Hands of Hope's front desk staff</p> <p>Rapid Rehousing: \$25,668 will be allocated to The Salvation Army, Bridges to Housing, and Central Valley Homeless Veteran Assistance Program for rental assistance and supportive services</p> <p>Emergency Shelter Operations: \$51,421 will be allocated to Sutter County and REST for staffing and operation of their emergency shelters</p>
FREED - Home Repair Program	\$ 25,000.00	Provide accessibility improvements and minor home repairs for low-income disabled and senior residents
Habitat for Humanity - Exterior Home Repair	\$ 60,000.00	The program will provide preventative home maintenance or critical home repair services to low-income City homeowners
Regional Housing Authority - Richland Public Housing Apartment Rehabilitation	\$ 25,000.00	Interior rehabilitation of one Public Housing unit located in a senior apartment complex
City of Yuba City - Maple Park Playground Equipment Replacement	\$ 100,000.00	Using CDBG funds to replace the playground equipment at Maple Park; the park is located in a Qualified Low/Mod Census Tract
City of Yuba City - ADA Sidewalk and Public Facility Improvements	\$ 223,489.00	Provide sidewalk and curb ramp improvements to meet ADA accessibility requirements throughout the City

Due to savings and/or delays in expenditures from previous activities, staff is also recommending the below transfers:

- Transfer \$25,000 from 2018 Owner-Occupied Rehab Program to Regional Housing Authority, Richland Public Housing Apartment: Total \$50,000

- Transfer \$55,000 from 2019 Administration to ADA Sidewalk and Public Facility Improvements:
Total \$279,097

Analysis of Impediments to Fair Housing Choice: (Attachment 3)

The Analysis of Impediments to Fair Housing Choice is required to be completed in conjunction with the preparation of the Consolidated Plan. In accordance with the Fair Housing Act, HUD requires jurisdictions to affirmatively further fair housing by conducting an analysis of impediments to fair housing choice, identifying appropriate actions to overcome impediments identified during the analysis and maintaining records of the analysis and actions taken.

COVID-19 Stimulus Funds

CDBG-CV funds

The City recently received \$392,293 of CARES Act CDBG-CV funds to prevent, prepare for, and respond to the COVID-19 pandemic.

To implement the CDBG-CV funding in compliance with HUD regulations, staff will need to return to Council to amend the proposed Consolidated Plan and Annual Action Plan to include the emergency funds by August 16, 2021. The federal processes to allocate the CDBG-CV funds to City determined priorities, will remain the same as standard entitlement CDBG funds, which includes publishing a Notice of Funding Available, amending the Five-Year Consolidated Plan and Annual Action Plan, publishing a Notice of Public Hearing, then presenting the recommendation to City Council for review and approval.

As these funds are to be used to prepare, prevent, or respond to COVID-19, staff recommends accepting applications including Fire Station turnout buildings, and establishing a CDBG-CV ad hoc committee with two Councilmembers participating on the review and recommendation process for future Council approval.

Activities funded with CDBG-CV funds must be well documented, including a detailed description of the activity and how the activity will prepare, prevent or respond to COVID-19. In addition, the activity cannot be funded with other funding sources in accordance with the Stafford Act. Examples of eligible activities include:

- Buildings and Improvements, including Public Facilities
- Assistance to Businesses, Including Special Economic Development Assistance
- Provision of New or Quantifiably Increased Public Services
- Planning, Capacity Building, and Technical Assistance

Additional information related to the above examples can be found in Attachment 4: Quick Guide to CDBG Eligible Activities to Support Coronavirus.

Fiscal Impact:

FY 2020/2021 CDBG revenue in the amount of \$666,861. The Action Plan proposes the following distribution of funds:

AGENCY	PROGRAM/SERVICE	RECOMMENDED FUNDING
City of Yuba City	Administration Costs (20% cap)	\$ 133,372.00

Sutter-Yuba Homeless Consortium	Homeless Services Consolidation (15% cap)	\$ 100,000.00
FREED Center for Independent Living	Home Repair/Modification Program for Disabled	\$ 25,000.00
Regional Housing Authority	Richland Public Housing Apartments	\$ 25,000.00
Habitat for Humanity	Yuba City Housing Preservation Program	\$ 60,000.00
City of Yuba City - Public Works	ADA Sidewalk and Public Facility Improvements	\$ 223,489.00
City of Yuba City - Parks Department	Maple Park - Playground Replacement	\$ 100,000.00
Total CDBG Funding		\$ 666,861.00

Including the proposed transfer of existing CDBG funds:

- Transfer \$25,000 from 2018 Owner-Occupied Rehab Program to Regional Housing Authority, Richland Public Housing Apartment: Total \$50,000
- Transfer \$55,000 from 2019 Administration to ADA Sidewalk and Public Facility Improvements: Total \$279,097

All of the proposed funding to agencies, programs, and/or service is proposed as grant money with no repayment required.

Alternatives:

Direct staff to modify the proposed recommendations in the Five-Year Consolidated Plan and Annual Action Plan. Changes may potentially require staff to re-notice the plan and present to City Council for approval at a later date.

Recommendation:

- Conduct a public hearing to receive comments on the 2020-2024 Consolidated Plan, 2020-2021 Action Plan, and Analysis of Impediments to Fair Housing Choice; and after consideration
- Adopt a resolution approving and authorizing staff to submit the required documentation to the Department of Housing and Urban Development (HUD), on the proposed Analysis of Impediments to Fair Housing Choice, 2020-2024 Consolidated Plan, and 2020-2021 Annual Action which allocates \$666,861 in CDBG funds.
- Approve staff moving forward with preparing and accepting applications for CARES Act CDBG-CV funding, and appointing two Councilmembers to participate on an *ad hoc* CDBG-CV Review and Recommendation Committee.

Attachments:

- 2020-2021 CDBG Annual Action Plan Funding Requests and Recommendations
- 2020-2024 Consolidated Plan & 2020-2021 Action Plan
- Analysis of Impediments to Fair Housing Choice
- Quick Guide to CDBG Eligible Activities to Support Coronavirus
- Resolution approving the 2020-2024 Consolidated Plan
- SF-424 – Application for Federal Assistance
- SF-424d – Construction Programs
- HUD Certifications

Prepared By:

/s/ Jaspreet Kaur

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Finance

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Submitted By:

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Diana Langley
Interim City Manager

BM

SM

SLC by email

ATTACHMENT 1

2020 CDBG ALLOCATION \$ 666,861.00

ADMINISTRATION AND PLANNING		Funded Amount		Admin Cap	
				20%	
City Staff	Administration Costs	\$	133,372	\$	133,372
TOTAL		\$	133,372	\$	133,372.00

PUBLIC SERVICES					Public Services Cap
AGENCY	PROGRAM/SERVICE	AMOUNT REQUESTED	MINIMUM REQUESTED	FUNDED AMOUNT	15%
Sutter-Yuba Homeless Consortium	Homeless Services Consolidation	\$ 100,000.00	\$ 100,000.00	\$ 100,000.00	
TOTAL		\$ 100,000.00	\$ 100,000.00	\$ 100,000.00	\$ 100,029

HOUSING PROGRAMS/PROJECTS				
	PROGRAM/PROJECT	AMOUNT REQUESTED	MINIMUM REQUESTED	FUNDED AMOUNT
FREED Center for Independent Living	Home Repair/Modification Program for Disabled	\$ 25,000.00	\$ 20,000.00	\$ 25,000.00
Regional Housing Authority	Richland Public Housing Apartments	\$ 55,000.00	\$ 50,000.00	\$ 25,000.00
Habitat for Humanity	Yuba City Housing Preservation Program	\$ 60,000.00	\$ 25,000.00	\$ 60,000.00
TOTAL		\$ 140,000.00	\$ 95,000.00	\$ 110,000.00

PUBLIC FACILITY & IMPROVEMENTS				
AGENCY	PROGRAM/PROJECT	AMOUNT REQUESTED	MINIMUM REQUESTED	Funded Amount
City of Yuba City - Public Works	ADA Sidewalk and Public Facility Improvements	\$ 250,000.00	\$ -	\$ 223,489.00
City of Yuba City - Parks Department	Maple Park - Playground Replacement	\$ 100,000.00	\$ 100,000.00	\$ 100,000.00
TOTAL		\$ 350,000.00	\$ 100,000.00	\$ 323,489.00

TOTAL				\$ 666,861.00
TOTAL FUNDING REQUESTS	\$	723,372.20	\$	295,000.00
AMOUNT IN EXCESS OF 2020 ALLOCATION	\$	56,511.20	\$	(371,861.00)

ATTACHMENT 2



2020-2024 CONSOLIDATED PLAN



Adopted:



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2020-2024 CONSOLIDATED PLAN

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2020-2024 CONSOLIDATED PLAN

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

Introduction

Each year the US Department of Housing and Urban Development (HUD) provides funding for housing and community development programs to the City of Yuba City (City), specifically Community Development Block Grant (CDBG) and other federal housing funds. In order to receive these funds, the City must complete a report every three to five years called the Consolidated Plan.

The purpose of the Consolidated Plan is to identify the City's housing and community development needs, priorities, goals, and strategies and to stipulate how funds will be allocated to housing and community development activities over the period of the Consolidated Plan, which in the case of the City is five years.

The City's Development Services Department is the lead agency in developing the 2020–2024 Consolidated Plan, (Plan). The Plan was prepared in accordance with HUD's Office of Community and Planning Development (CPD) eCon Planning Suite (launched in May 2012), including the Consolidated Plan template in IDIS (Integrated Disbursement and Information System). Most of the data tables in the Plan are populated with default data from the US Census Bureau, mainly 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) and American Community Survey (ACS) data. Other sources are noted throughout the Plan, including the addition of more recent data where available and practical. The research process involved the analysis of the following key components: demographic, economic, and housing data; affordable housing market; special needs populations (homeless and non-homeless); consultation with public and private agencies; and citizen participation.

The Plan process also included the development of the first-year Action Plan, which is the annual plan the City prepares pursuant to the goals outlined in the Consolidated Plan. The Action Plan details the activities the City will undertake to address the housing and community development needs and local objectives using CDBG and other housing funds received during program year 2020/2021.

The Plan is divided into six sections, with the Needs Assessment, Market Analysis, and Strategic Plan forming the key sections:

1. Executive Summary
2. Process
3. Needs Assessment
4. Market Analysis
5. Strategic Plan
6. Annual Action Plan

Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The City has organized its priority needs according to the structure presented in HUD regulations (24 CFR 91.215): affordable housing, homelessness, and non-housing community development. Priority is assigned based on the level of need demonstrated by the data collected during the preparation of the Plan, specifically in the Needs Assessment and Market Analysis; the information gathered during the consultation and citizen participation process; and the availability of resources to address these needs. Based on all of these components, housing needs are considered a high priority, followed by homelessness and non-housing community development needs.

The City has six (6) goals to address housing and community development needs between Fiscal Years 2020 and 2024:

1. Increase supply of affordable rental housing for the City's lowest-income households.
2. Preserve existing affordable housing stock.
3. Provide housing and services to special needs populations.
4. Increase access to homeownership opportunities for City residents.
5. Provide funding for public facilities and improvements.
6. Promote economic development activities in the City.

During the five-year Plan period, the City expects to receive approximately \$650,000 annually in CDBG funding, for a five-year total of \$3,250,000. CDBG funds are used by the City for public services, public facilities and improvements, housing activities and planning and administrative costs. The CDBG program's primary objective is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income. Funds can be used for a wide array of activities, including housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

The City also anticipates applying for Home Investment Partnerships Program (HOME) funding through the California Department of Housing and Community Development (HCD) for additional housing activities. The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low- and moderate-income households, including building acquisition, new construction and reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.

The City also applies for CalHome funding from HCD when funding announcements are made by the State. These funds are awarded on a competitive basis for mortgage assistance for low- or very low-income first-time homebuyers or for owner-occupied housing rehabilitation for low- or very low-income homeowners. Generally, the City's funding request has been for both the First-Time Home Buyer Assistance and Owner-Occupied Housing Rehabilitation Programs.

CDBG and HOME funds are often coupled with local funds, allowing affordable housing projects to compete for additional funding provided by tax credits, bonds, and state financing programs. An investment by the City makes the projects more competitive in various funding competitions. All sources and types of funds are limited, however, as in the past, the City will be as creative as possible in finding other sources of funding from local, state, federal, and private sources in order to develop and deliver efficient and cost-effective projects.

Evaluation of past performance

Each year the Department of Housing and Urban Development assesses the City's management of CDBG program funds. In addition, the City is required annually, at conclusion of the Program Year, to complete and submit to HUD a Consolidated Annual Performance and Evaluation Report (CAPER) reporting on annual Action Plan Goal outcomes and expenditures. The City's key accomplishments over the 2015–2019 Consolidated Plan period include the following:

NOTE: The figures below only reflect the accomplishments for Program Years 2015 – 2018 as the 2019 CAPER won't be completed until later in 2020.

1. Provided funds for the rehabilitation of 83 affordable rental housing units.
2. Assisted 10,610 persons through the provision of assistance to nonprofit organizations to provide supportive services to targeted special needs populations, which includes homeless.
3. Provided rental assistance utilizing the Regional Housing Authority's Housing Choice Voucher Program, (formerly Section 8), to 2,939 households.
4. Provided down payment assistance to 10 first-time homebuyers with HOME funds.
5. Provided loans to 10 low-income homeowners to rehabilitate their homes.

6. Provided assistance to 182 low-income senior and disabled homeowners with minor health and safety repairs.
7. Provided funds for 9 public facility and improvement projects that benefitted low-income residents.

Overall, the City has performed satisfactorily managing the CDBG Program and addressing its priority needs through the programs set out in the previous Consolidated Plan.

Summary of citizen participation process and consultation process

The Plan process involved the housing and community development organizations in the City, nonprofit providers of affordable housing and service providers to the City's low-income and special needs populations, advocates, and others. A community meeting was held on November 21, 2019, to make available and request participation in 2020 Community Needs to aid in identifying housing and community assistance needs in the City and assist in program development. A public meeting was held on February 19, 2020 to present findings from the consolidated planning research process and to solicit public input on the Draft 2020 Consolidated Plan. Extensive outreach was conducted to promote this meeting, including posting the bilingual (English/Spanish) notice on the City's website (including the City's Facebook page), The Appeal-Democrat newspaper, e-mail to the Regional Housing Authority, local businesses and social service agencies and affordable housing developers. Consultation and citizen participation is discussed in greater detail in the Process section of this Plan.

Summary of public comments

RESERVED FOR PUBLIC COMMENTS

Summary of comments or views not accepted and the reasons for not accepting them

RESERVED FOR PUBLIC COMMENTS

Summary

RESERVED FOR PUBLIC COMMENTS

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	City of Yuba City	Development Services Department

Table 1 – Responsible Agencies

Narrative

The City's Development Services Department (DSD) is the lead agency responsible for overseeing development of the Consolidated Plan (Con Plan). The City's DSD is also responsible for the administration of CDBG funds, including facilitating project/program implementation, monitoring project activities and outcomes and ensuring compliance with all HUD requirements and regulations such as fair housing, Davis-Bacon requirements (prevailing wages), environmental reviews, affirmative action, competitive bidding procedures and fiscal and contract administration. CDBG activities are carried out by both internal City departments, as well as external sub-recipients.

The Department of Housing and Urban Development (HUD) requires entitlement jurisdictions that receive Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME) or Emergency Shelter Grant (ESG) funds directly from HUD to complete a Consolidated Plan.

The City does not receive HOME or ESG funds directly from HUD; therefore, the Con Plan focuses only on identifying and prioritizing programs allowed under CDBG funding.

HUD uses special tabulations of Census data to determine areas where at least 51% of households have incomes at or below 80% of the area median income (AMI). In order for the City to undertake area benefit activities using CDBG funds, at least 51% of the residents in a census tract block group must be low-income. The City currently has seven (7) Qualified Low/Mod Census Tract Block Groups at or above the 51% of the low-income threshold. Those census tract block groups are as follows:

- Census Tract 501.02 Block Groups 1 and 3
- Census Tract 502.01 Block Groups 1 and 2
- Census Tract 502.02 Block Groups 2, 3 and 4

Consolidated Plan Public Contact Information

Comments and/or inquiries regarding the Con Plan should be directed to:

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PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

Introduction

The consolidated planning process requires jurisdictions to contact and consult with other public and private agencies when developing the Plan. The Plan itself must include a summary of the consultation process, including identification of the agencies that participated in the process. Jurisdictions also are required to summarize their efforts to enhance coordination between public and private agencies.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

The City has developed and maintained on-going, collaborative relationships with the Regional Housing Authority, Sutter/Yuba Homeless Consortium, local service providers, Sutter County agencies and the Yuba-Sutter Economic Development Corporation in an effort to enhance the coordination of services to low and moderate income persons, special needs groups and businesses. The City's efforts have included attending meetings, exchange of information and coordination of services.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The City works in cooperation with the Sutter-Yuba Homeless Consortium to address the needs of homelessness in the community. The Sutter-Yuba Homeless Consortium consists of over 100 Stakeholders, including the City, that utilize the Continuum of Care planning process to address homeless needs in the City and throughout the region. The Sutter-Yuba Homeless Consortium allows for maximizing funding resources, helps to avoid duplication of services and provides for a comprehensive approach to homelessness. During the Consolidated Plan process the City consulted members of the Sutter-Yuba Homeless Consortium in order to meet the Con Plan requirements.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

This section is not applicable as the City is not an ESG grantee. The Sutter-Yuba Homeless Consortium is the entity that administers the HMIS.

Describe agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	Regional Housing Authority (RHA)
	Agency/Group/Organization Type	PHA
	What Section of the Plan was addressed by Consultation?	Public Housing Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The RHA was consulted by email and invited to comment and provide input at public meetings held during the development of the Con Plan. Outcome of the consultation was better understanding of the rehabilitation and renovation needs of public housing units and public housing resident supportive housing needs.
2	Agency/Group/Organization	Sutter-Yuba Homeless Consortium (CoC)
	Agency/Group/Organization Type	Housing Services – Housing Services – Children Services – Persons with Disabilities Services – Persons with HIV/AIDS Services – Victims of Domestic Violence Services – Homeless Services – Health Services – Education Services – Employment Regional Organization
	What Section of the Plan was addressed by Consultation?	Homeless Strategy

		<p>Homeless Needs – Chronically Homeless</p> <p>Homeless Needs – Families with Children</p> <p>Homeless Needs – Veterans</p> <p>Homeless Needs – Unaccompanied Youth</p> <p>Anti-Poverty Strategy</p>
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Sutter Yuba Homeless Consortium was consulted by email and invited to comment and provide input at public meetings held during the development of the Consolidated Plan. Outcome of the consultation was better understanding of the housing and supportive service needs of homeless persons.
3	Agency/Group/Organization	FREED Center for Independent Living
	Agency/Group/Organization Type	<p>Non Profit</p> <p>Services – Housing</p>
	What Section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	FREED was consulted by email and invited to comment and provide input at public meetings held during the development of the Consolidated Plan. Outcome of the consultation was better understanding of the housing and supportive service needs of the disabled population.
4	Agency/Group/Organization	Casa de Esperanza (Casa)
	Agency/Group/Organization Type	<p>Non Profit</p> <p>Services – Housing</p>
	What Section of the Plan was addressed by Consultation?	<p>Homeless Needs Assessment</p> <p>Non-Homeless Special Needs</p>

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Casa was consulted by email and invited to comment and provide input at public meetings held during the development of the Con Plan. Outcome of the consultation was better understanding of the housing and supportive needs of domestic violence, sexual assault, stalking and human trafficking victims.
5	Agency/Group/Organization	Yuba Sutter Veterans Stand Down
	Agency/Group/Organization Type	Non-Profit Services -- Housing
	What Section of the Plan was addressed by Consultation?	Homeless Needs Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Yuba Sutter Veterans Stand Down and Central Valley Homeless Veterans Assistance Program was consulted by email and telephone and invited to comment and provide input at public meetings held during the development of the Con Plan. Outcome of the consultation was better understanding of the housing and supportive needs of Veterans.
6	Agency/Group/Organization	Bridges to Housing
	Agency/Group/Organization Type	Non-Profit Services - Housing
	What Section of the Plan was addressed by Consultation?	Homeless Needs Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Bridges to Housing was consulted by email and invited to comment and provide input at public meetings held during the development of the Con Plan. Outcome of the consultation was better understanding of the housing and supportive needs of the homeless.

7	Agency/Group/Organization	Yuba Sutter Behavioral Health
	Agency/Group/Organization Type	Sutter County
	What Section of the Plan was addressed by Consultation?	Homeless Needs Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Behavioral Health was consulted by email and telephone and invited to comment and provide input at public meetings held during the development of the Con Plan. Outcome of the consultation was better understanding of the housing and supportive health of behavioral health clients.
8	Agency/Group/Organization	Sutter County Public Health
	Agency/Group/Organization Type	Sutter County
	What Section of the Plan was addressed by Consultation?	Market Analysis Housing Condition
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public Health was consulted by email and telephone and invited to comment and provide input during the development of the Con Plan. Outcome of the consultation was better understanding of the lead poisoning, specifically lead based paint poisoning.

Table 2 – Agencies, groups, organizations who participate

Identify any Agency Types not consulted and provide rationale for not consulting

The City has not intentionally excluded or avoided consulting any agency type or organization during the consolidated planning process.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Sutter-Yuba Homeless Consortium	The goals contained in the Strategic Plan are consistent with the Continuum of Care. The City will work within the framework of the Sutter-Yuba Homeless Consortium of Care to address homeless needs.
Yuba City Housing Element	City of Yuba City	The goals contained in the Strategic Plan are consistent with the Programs outlined in the Housing Element.
Yuba City Economic Development Strategic Work Plan	City of Yuba City	The goals contained in the Strategic Plan are consistent with the initiatives outlined in the Economic Development Strategy.
PHA 5-Year Plan	Regional Housing Authority	The goals contained in the Strategic Plan are consistent with the needs, goals and objectives outlined in the PHA 5-year Plan.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The City will, in conjunction with the development of affordable housing, review applications for funding, implementation of activities and delivery of services targeted to low and moderate-income households, continue to work and coordinate with other public entities, including the Regional Housing Authority, Sutter County and the State of California.

PR-15 Citizen Participation

Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The City followed requirements for citizen participation outlined in the City's Citizen Participation Plan. The City encouraged citizens along with local and regional organizations to participate during the 2020-2024 Consolidated Plan. Regional and local service agencies, non-profit organizations, City staff, City Council, City Commissions, were invited to two public meetings held to discuss the Consolidated Plan update and solicit comments. The first meeting was held on November 21, 2019 at 10:30 a.m. at Yuba City Hall. The second meeting was held on February 19, 2020 at 10:00 a.m. at Yuba City Hall. The City's website also included notification of the City's 2020-2024 Consolidated Plan and development of the 2020-2021 Annual Action Plan and encouraged citizens to provide input. Notice of these meetings were also posted on the City's website to obtain input from a cross section of citizens and service providers on housing and community development needs and to assist in developing priorities for expenditure of CDBG funds.

In addition to public meetings and website, service providers and local agencies were contacted and requested to provide input and specific information relative to the needs of the populations they serve.

The Draft 2020-2024 Consolidated Plan and 2020-2021 Annual Action Plan was made available for public review and comment during a 30-day period, May 15, 2020 through June 16, 2020. A public hearing will be held in June 16, 2020 before the City Council to solicit public comment regarding the Draft 2020-2024 Consolidated Plan and 2020-2021 Annual Action Plan.

Prior to submission to the Department of Housing and Urban Development (HUD), the City Council reviews and approves the Consolidated Plan and Annual Action Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Workshop	Minorities Non-English speaking – Specify other language: Spanish Persons with disabilities: Non-targeted/broad community Residents of public and assisted housing	The City hosted a public workshop on November 21, 2019 to provide information on the consolidated planning process.	No comments were received.	No comments were received.	www.yubacity.net
2	Public Meeting	Minorities Non-English speaking – Specify other language: Spanish Persons with disabilities: Non-targeted/broad community Residents of public and assisted housing	The City hosted a public meeting on February 19, 2020 to present the findings from the consolidated planning research process and allowed the public to provide input on the Draft 2020-2024 Consolidated Plan and 2020-2021 Annual Action Plan.			www.yubacity.net

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Hearing	Non-targeted/broad community	The City will hold a public hearing on June 16, 2020 to request City Council adopt and approve the 2020-2024 Consolidated Plan and 2020-2021 Annual Action Plan and authorize the submission to HUD.			www.yubacity.net
4	Newspaper Ad	Non-targeted/broad community	A 30-day public notice for the mid-June 2020 public meeting and public hearing will be published in the Appeal-Democrat newspaper.			www.yubacity.net
5	Internet Outreach	Minorities Non-English speaking – Specify other language: Persons with disabilities: Non-targeted/broad community Residents of public and assisted housing	Notices of the community meetings, were posted on the City’s website.			www.yubacity.net

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Email	Non-targeted/broad community	Notices of the community meetings were distributed via email to the Regional Housing Authority, Sutter-Yuba Homeless Consortium, Service Providers, City Departments and Council and affordable housing developers.			www.yubacity.net

Table 4 – Citizen Participation Outreach

Needs Assessment

The Needs Assessment section of the Consolidated Plan addresses the following areas: 1) Housing Needs, including Public Housing Needs; 2) Homeless Needs; 3) Non-Homeless Special Needs; and 4) Non-Housing Community Development Needs. The needs are projected for the five-year period covered by the Consolidated Plan.

A variety of resources were used to identify and prioritize needs, including census information, consultation with public and private providers of housing and health and social services.

According to the 2011-2015 CHAS data, 39% of all City households experience a cost burden and are in need of more affordable housing. The lower the income the greater the incidence of cost burden, which is not surprising. Renters have a greater need than do owner households. And, smaller households also have a greater need than do larger households. Lower income households that lack affordable housing may find themselves at risk of homelessness. Affordable housing for lower income households, including special needs populations, was the greatest need identified in the needs assessment.

Public housing needs vary from public housing rehabilitation and renovation to job training and education programs for residents.

The homeless population has a variety of needs and it requires a comprehensive approach to addressing those needs. The homeless needs include emergency, transitional and permanent supportive housing, along with supportive services that address the underlying causes of homelessness, including mental and physical illness, substance abuse, education and job training. Those at risk of becoming homeless also need assistance with housing costs and supportive services.

Special needs populations are also in need of affordable housing but may also require specialized housing and/or supportive services to live independently.

The following provides specific data and a more detailed narrative regarding the needs of the City's residents.

Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section of the Plan provides a summary of the City's needs related to affordable housing, special needs housing, community development, and homelessness. The Needs Assessment includes the following sections:

1. Housing Needs Assessment
2. Disproportionately Greater Need
3. Public Housing
4. Homeless Needs Assessment
5. Non-Homeless Needs Assessment
6. Non-Housing Community Development Needs

The Needs Assessment identifies those needs with the highest priority, which forms the basis for the Strategic Plan section and the programs and projects to be administered. Most of the data tables in this section are populated with default data from the Comprehensive Housing Affordability Strategy (CHAS) developed by the Census Bureau for HUD based on the 2011–2015 American Community Survey (ACS). Other sources are noted throughout the Consolidated Plan.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	64,925	66,040	2%
Households	20,646	21,860	6%
Median Income	\$50,512.00	\$50,649.00	0%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	2,225	2,795	3,860	2,180	10,800
Small Family Households	940	1,090	1,485	990	5,225
Large Family Households	180	345	800	505	1,615
Household contains at least one person 62-74 years of age	360	595	730	435	2,555
Household contains at least one person age 75 or older	324	455	600	265	1,035
Households with one or more children 6 years old or younger	505	825	1,030	725	1,564

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	55	50	60	15	180	0	0	0	0	0
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	90	185	30	40	345	20	20	65	45	150
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	90	175	185	130	580	35	15	150	20	220
Housing cost burden greater than 50% of income (and none of the above problems)	1,105	725	215	4	2,049	360	310	310	140	1,120

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	90	565	1,240	240	2,135	35	245	375	350	1,005
Zero/negative Income (and none of the above problems)	85	0	0	0	85	45	0	0	0	45

Table 7 – Housing Problems Table

Data Source: 2011-2015 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,345	1,135	485	190	3,155	415	340	525	210	1,490
Having none of four housing problems	220	770	1,830	920	3,740	115	550	1,025	865	2,555
Household has negative income, but none of the other housing problems	85	0	0	0	85	45	0	0	0	45

Table 8 – Housing Problems 2

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	740	810	555	2,105	105	140	290	535
Large Related	100	285	290	675	65	15	250	330
Elderly	230	270	305	805	180	330	175	685
Other	360	295	350	1,005	94	75	100	269
Total need by income	1,430	1,660	1,500	4,590	444	560	815	1,819

Table 9 – Cost Burden > 30%

Data Source: 2011-2015 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	720	390	25	1,135	105	100	130	335
Large Related	70	100	55	225	65	15	45	125
Elderly	140	155	100	395	150	180	105	435
Other	345	160	40	545	90	25	50	165
Total need by income	1,275	805	220	2,300	410	320	330	1,060

Table 10 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	125	290	190	130	735	39	35	40	34	148
Multiple, unrelated family households	60	45	19	40	164	15	4	145	35	199
Other, non-family households	0	25	4	0	29	0	0	35	0	35
Total need by income	185	360	213	170	928	54	39	220	69	382

Table 11 – Crowding Information –

Data Source: 2011-2015 CHAS

Describe the number and type of single person households in need of housing assistance.

According to the 2013-2017 American Community Survey, 22.7% of all City households are single person households. Seniors over the age of 65 account for 44.7% of single households. Single person households typically have lower incomes than do family households and therefore are more likely to suffer a cost burden. Although specific information regarding the needs of single households in general is not readily available, it can be assumed that many single households fall under the category of special needs populations (seniors, disabled, and homeless) and have the same housing assistance needs as those subpopulations.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

According to the 2013-2017 American Community Survey it is estimated that 8,544 (12.9%) persons in the City have some type of disability. The disabilities include hearing, vision, cognitive difficulty, ambulatory, and self-care difficulty. It is presumed that the majority of disabled persons are low-income, either due to the fact that their disability limits their ability to work and/or they are seniors who are retired and have limited income. Many disabled households experience a cost burden due to their low income status and are in need of affordable housing. Physically disabled households may also need housing assistance in the form of housing rehabilitation or accessibility modifications.

Casa de Esperanza (Casa) provides services to domestic violence, sexual assault, teen violence, stalking and human trafficking victims in Sutter, Yuba and Colusa counties, (including Beale Air Force Base). In 2019 Casa reported serving over 1,700 calls for service. The majority of their cases were domestic violence or sexual assault victims. Approximately 42% of domestic violence victims are single persons

and 58% are families with children. Whereas, sexual assault victims, single persons make up 62% and 38% are families with children. Many domestic violence victims are displaced and need housing assistance, including emergency shelter, transitional housing and permanent affordable housing. Sexual assault and stalking victims may also need housing assistance, depending on the nature of the incident.

What are the most common housing problems?

Housing problems identified by HUD are: 1) substandard housing, housing lacking complete plumbing or kitchen facilities; 2) overcrowded housing, more than one person per room in a housing unit. The U.S. Consolidated Plan YUBA CITY 18 OMB Control No: 2506-0117 (exp. 06/30/2018) Census defines a “room” as living room, dining room, bedroom, kitchen, finished attic and basement, recreation room, family room, permanently enclosed porch, and office space; and 3) cost burden, households paying more than 30% of their gross income for rent and utilities.

The most common housing problem for the City’s households is cost burden. According to the 2011-2015 CHAS data, 39% of total households in the City are experiencing a cost burden. Approximately 5.9% of all households are living in overcrowded housing and 1% are living in substandard conditions based on the definitions noted above.

Providers report an increase first-time homeless and are seeing more seniors becoming homeless due to a lack of affordable housing. Providers report an ever increasing shortage of available affordable housing due to landlords wanting to take advantage of the housing price increases and low vacancy rates. Landlords are selling rental units or raising rents beyond what is affordable to lower income households.

Are any populations/household types more affected than others by these problems?

Lower income households (80% or less of the AMI) experience a higher percentage of cost burden than do moderate income households. Seventy-two percent (72%) of lower income households are experiencing a cost burden. As income goes down, the percentage of households experiencing a cost burden goes up. Eighty-two (82%) percent of very low-income (50% or less of AMI) households and eighty-four (84%) percent of extremely low-income (30% or less of AMI) households are experiencing a cost burden. Fifty-six (56%) percent of very low-income and extremely low-income households are experiencing a severe cost burden (paying more than 50% of income for housing costs). Renter households (71%) experience a higher percentage of cost burden than do owner households (29%). Small households also have a higher percentage of cost burden than do larger households. Smaller households may be one-income households, female-headed households, and/or single parent households.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance:

Lower income Individuals and families who are housed but at risk of becoming homeless may be having difficulty paying rent often because of a lack of sufficient income and/or a lack of affordable housing. Other reasons for risk of homelessness are illness, substance abuse or loss of a job. Often lower income persons must make a choice between paying their rent and paying for day-to-day necessities like utilities, food, clothing, and/or transportation. Those at risk of becoming homeless need assistance with rent, security deposits, utility payments and food. They also need supportive services for mental health, physical disabilities, substance abuse and domestic violence.

Two agencies offer Rapid Rehousing Programs, Salvation Army and Bridges to Housing. Salvation Army's Rapid Re-housing Program offers assistance with re-housing to persons that are homeless or at risk of becoming homeless with security deposits, short-term rental assistance, and/or utility assistance and deposits. Bridges to Housing's Program provides only security deposit assistance. Recipients of that type assistance typically will also receive case management services and supportive services in an effort to prevent future homelessness.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The City works within the framework of the Sutter-Yuba Homeless Consortium as noted previously. It is difficult to estimate the number of households at risk of becoming homeless at any given time. All households experiencing a cost burden, living in overcrowded situations, or living in substandard housing are at risk of becoming homeless, especially if compounded by emergencies, such as health issues or loss of a job. The Homeless Consortium does not have an official operational definition of at risk of homelessness. However, service providers state that for households to be considered at risk of homelessness and eligible for assistance, they must be under a Notice to Vacate (3-day or 30-day) or "doubled-up" (living with friends or family and their name is not on the rental agreement).

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Housing characteristics that put households at risk of becoming homeless are cost burden, living in overcrowded situations or substandard housing. Physical disabilities, mental health issues, drug and alcohol abuse may impact the ability to earn a living and contribute to instability and risk of becoming

homeless. Housing providers report a lack of affordable housing is the greatest contributor to risk of homelessness in the City. The 2019 PIT identified 251 persons who were precariously housed, living in households with friends or family, most often in overcrowded situations that put them at risk of becoming homeless.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

According to the 2011-2015 CHAS data, approximately 42% of households in the City are experiencing at least one housing problem. The charts below show by income category the occurrence of housing problems by racial and ethnic groups and whether any particular racial or ethnic groups impacted disproportionately by housing problems, including a lack of kitchen or plumbing facilities, more than one person per room and/or paying more than 30% of gross income for housing costs.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,885	210	130
White	835	70	24
Black / African American	90	0	4
Asian	325	90	40
American Indian, Alaska Native	15	15	15
Pacific Islander	25	0	0
Hispanic	500	30	0

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,285	510	0
White	1,135	355	0
Black / African American	20	0	0
Asian	165	25	0
American Indian, Alaska Native	30	0	0
Pacific Islander	15	0	0
Hispanic	805	100	0

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,625	1,230	0
White	1,320	670	0
Black / African American	45	0	0
Asian	400	95	0
American Indian, Alaska Native	25	4	0
Pacific Islander	0	0	0
Hispanic	785	345	0

Table 14 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	985	1,195	0
White	435	470	0
Black / African American	54	45	0
Asian	165	175	0
American Indian, Alaska Native	10	10	0
Pacific Islander	0	0	0
Hispanic	250	475	0

Table 15 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Within the Housing Problems Category, an analysis of the CHAS data reveals that 70% of households (7,780 households) earning between 0% and 100% of Area Median Income report at least one housing problem. Further analysis of those households by racial and ethnic categories show one racial group has a disproportionately greater incidence of housing problems. Thirteen percent (13%) of Asian households (1,055) are experiencing at least one housing problem. In comparison, 30% of Hispanic households (2,340) are reporting housing problems.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The 2011-2015 CHAS Data shows that 42% of all City households are experiencing severe housing problems. Severe housing problems are characterized by a higher level of overcrowding (1.5 persons per room) or cost burden (paying more than 50% of gross income for housing costs) or lack of kitchen or plumbing facilities. The charts below show by income category the occurrence of severe housing problems and any racial and ethnic groups impacted disproportionately by severe housing problems.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,760	335	130
White	745	160	24
Black / African American	80	10	4
Asian	315	100	40
American Indian, Alaska Native	15	15	15
Pacific Islander	25	0	0
Hispanic	485	45	0

Table 16 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,475	1,320	0
White	665	830	0
Black / African American	20	0	0
Asian	120	65	0
American Indian, Alaska Native	0	30	0
Pacific Islander	15	0	0
Hispanic	570	340	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,010	2,855	0
White	380	1,610	0
Black / African American	25	20	0
Asian	265	235	0
American Indian, Alaska Native	10	25	0
Pacific Islander	0	0	0
Hispanic	300	825	0

Table 18 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	400	1,785	0
White	180	725	0
Black / African American	4	95	0
Asian	75	265	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	135	590	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

The CHAS data shows that 42% of households (4,645) earning between 0% and 100% of Area Median Income are experiencing severe housing problems. Analysis of those households by categories show one racial group has a disproportionately greater incidence of housing problems; sixteen percent (16%) of Asian households (775 households) are experiencing severe housing problems. In comparison, thirty-two percent (32%) of Hispanic households (1,490) are experiencing severe housing problems.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Households paying more than 30% of their income for housing costs are considered to have a housing cost burden. Households paying more than 50% of their income for housing costs are considered to have a severe cost burden. Households experiencing a cost burden or severe cost burden may have difficulty paying for other day to day needs such as food, clothing, transportation and medical costs. A total of 39% of the City’s households are experiencing some measure of cost burden. The chart below shows the Housing Cost Burden by racial and ethnic groups as compared to the jurisdiction as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	13,150	4,910	3,670	130
White	7,825	2,585	1,905	24
Black / African American	280	165	105	4
Asian	1,655	600	530	40
American Indian, Alaska Native	70	70	25	15
Pacific Islander	35	0	45	0
Hispanic	2,705	1,355	895	0

Table 20 – Greater Need: Housing Cost Burdens AMI
 Data Source: 2011-2015 CHAS

Discussion:

An estimated 22% of the City’s households are experiencing a cost burden and another 17% of households are experiencing a severe cost burden. Analysis of households by racial and ethnic groups show two groups, 3% of Asian households (600) and 6% of Hispanic households (1,355) are disproportionately impacted by cost burden. In contrast, (2%) of Asian households (530) and 4% of Hispanic households (895) are experiencing severe cost burden.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Eighty-five percent (85%) of households (1,885 households) earning between 0% and 30% of Area Median Income (AMI) are experiencing housing problems. One racial group, Asian, has a disproportionately greater incidence of housing problems and greater need. Compared to the category as a whole, 71% (325 households) report at least one housing problem. And, 94% of Hispanic households (500 households) report at least one housing problem.

Eighty-two percent (82%) of households (2,285 households) earning between 30% and 50% of AMI are experiencing housing problems. Within this income category one racial group experiences a disproportionately greater incidence of housing problems. Eighty-seven percent (87%) of Asian households (165 households) report at least one housing problem. And, 87% of Hispanic households (805 households) report at least one housing problem.

Sixty-eight percent (68%) of households (2,625 households) earning between 50% and 80% of AMI are experiencing housing problems. Within this income category one racial group is experiencing a disproportionately greater incidence of housing problems. One-hundred percent (81%) of Asian households (400 households) are experiencing at least one housing problem. Sixty-nine percent (69%) of Hispanic households (785 households) are experiencing at least one housing problem.

Forty-five percent (45%) of households (985 households) earning between 80% and 100% of the AMI are experiencing at least one housing problem. Within this income category two racial groups are experiencing a disproportionately greater need. Fifty-five percent (55%) of Black/African American households (54 households) are experiencing housing problems. Forty-nine percent (49%) of Asian households (165 households) report at least one housing problem. And, 34% of Hispanic households (250 households) are experiencing housing problems.

If they have needs not identified above, what are those needs?

No additional needs have been identified.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

There are no racial or ethnic groups with a disproportionately greater need concentrated in specific areas or neighborhoods.

NA-35 Public Housing – 91.205(b)

Introduction

The City does not own or operate public housing; the Regional Housing Authority (RHA) serves the four-county area, including the City. There are 406 housing units, including 2 Public Housing projects owned and/or managed by the RHA and located within the City. These units are targeted to a variety of household types, including family households, seniors and farmworkers.

The demand for additional public housing and Housing Choice Vouchers (HCV) is evident from the size of the Housing Authority waiting lists. There are currently 1,708 households on the Section 8 Housing Choice Voucher waiting list for all counties covered by the RHA; there are 2,081 applicants on the Public Housing waiting list. There are 2,081 applicants on the public housing waiting list.

The information reported in the Tables below show information for Yuba City only.

Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers in use	0	0	123	600	29	569	2	0	0

Table 21 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: Regional Housing Authority

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant -based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	20,442	15,971	20,409	16,675	10,829	0
Average length of stay	0	0	6	5	1	5	1.5	0
Average Household size	0	0	3	2.21	3.15	2.5	1	0
# Homeless at admission	0	0	25	37	0	35	2	0
# of Elderly Program Participants (>62)	0	0	59	555	3	551	1	0
# of Disabled Families	0	0	50	289	8	570	3	0
# of Families requesting accessibility features	0	0	164	1,000	0	1,000	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 22 – Characteristics of Public Housing Residents by Program Type

Data Source: Regional Housing Authority

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
White	0	0	327	906	0	906	0	0	0
Black/African American	0	0	21	42	0	42	0	0	0
Asian	0	0	5	33	0	33	0	0	0
American Indian/Alaska Native	0	0	4	17	0	17	0	0	0
Pacific Islander	0	0	3	2	0	2	0	0	0
Other	0	0	0	0	0	0	0	0	0

Table 23 – Race of Public Housing Residents by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: Regional Housing Authority

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Hispanic	0	0	257	152	9	142	1	0	0
Not Hispanic	0	0	101	446	16	428	2	0	0

Table 24 – Ethnicity of Public Housing Residents by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: Regional Housing Authority

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Regional Housing Authority (RHA) is able to meet the accessibility needs of tenants and applicants through reasonable accommodation modifications or accessible units. RHA staff states there are neither current tenants in need of reasonable accommodation/modification nor are there any current tenants waiting to transfer to accessible units. There are currently 96 households on the public housing waiting list who have requested accessible features, including mobility and/or sensory features. The accessibility needs of applicants are expected to be met when their names rise to the top of the waiting list either through accessible unit(s) or reasonable accommodation.

In 2011, the RHA hired a consultant to perform a Physical Needs Assessment (PNA) of its Public Housing units located in the City, (Richland Housing Center and River City Manor).

Richland Housing Center was constructed in 1962 and includes 99 units (85 family units and 14 senior units). The PNA concludes that since the property is not new construction nor has undergone substantial rehabilitation or other rehabilitation requiring the property meet current accessibility standards, the property is only required to complete reasonable accommodation and is in compliance; however, five (5) units were fully renovated to current accessibility standards in 2000. Presently 5% of the units are accessible for individuals with mobility impairments and/or sensory impairments. All requests for reasonable accommodation are granted on a case-by-case basis.

River City Manor is a 24-unit senior public housing project, constructed in 1984. The PNA concludes that the property is not new construction nor has undergone substantial rehabilitation or other rehabilitation that requires it meet current accessibility standards and is therefore required to only provide reasonable accommodation. The PNA notes the property construction date occurred at a time when accessibility guidelines were in their infancy, and although accessibility was considered in the project design, the accommodations are not up to today's standards. The project has 3 "handicap" units; however, these units are not considered mobility or sensory accessible by current guidelines. The RHA completes requests for reasonable accommodation on a case-by-case basis.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The RHA reports there are 1,708 applicants on the waiting list for the Housing Choice Voucher (Section 8) Program. There are 2,081 applicants on the waiting list for public housing units. The RHA staff report the most pressing needs of Public Housing residents and Housing Choice Vouchers are expanded affordable housing opportunities, increased educational and job training programs and increased employment opportunities.

How do these needs compare to the housing needs of the population at large?

Affordable housing, education, job training programs and employment opportunities are also needs of the population in general. Expanded affordable housing opportunities will serve to address the needs of households experiencing a housing cost burden and increase housing choice; however, another means of addressing housing cost burden is through education, job training and employment opportunities. Education, expanded job skills and higher paying jobs provide lower income households, including public housing residents, with the ability to increase their income and thereby the ability to choose from a wider variety of housing options.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Homelessness encompasses both those that are without any type of housing or living in shelters and those that are at risk of becoming homeless due paying a high percentage of their income for housing or living in overcrowded or substandard housing. Although the reasons for homelessness vary, the primary cause of homelessness is a scarcity of affordable housing. Other factors that play a large part in homelessness, especially chronic homelessness, are mental and physical illness, criminal records, domestic violence, substance abuse, negative credit or rental histories, lack of education and/or lack of job skills. Affordable housing is needed along with supportive services that address these other underlying factors in order to break the cycle of homelessness.

The City does not have services for the homeless, but relies on the Sutter-Yuba Homeless Consortium and the Continuum of Care process to provide services to the homeless. The Sutter-Yuba Homeless Consortium is a regional, non-profit organization that brings together over 100 Stakeholders consisting of public and private agencies and organizations to address the full scope of housing and supportive services needed by the varying homeless population.

Annually the Homeless Consortium, along with volunteers, conduct a Point-in-Time (PIT) count of the homeless; the PIT is only a snap shot of the homeless population at any given time. The information is limited since it cannot count every person that is homeless or count people that are at risk of homelessness. It does however provide an estimate of the homeless population, helps to assess the needs of the various subpopulations and helps to assess the progress in ending homelessness.

The following section provides an assessment of the homeless population and needs based upon the 2019 PIT.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that person's experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	125	420
Black or African American	18	27
Asian	2	8
American Indian or Alaska Native	19	32
Native Hawaiian or Other Pacific Islander	0	5
Multiple Races	38	27
Ethnicity:	Sheltered:	Unsheltered (optional)
Non-Hispanic/Non-Latino	158	462
Hispanic/Latino	44	57

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The 2019 Point-in-Time (PIT) count identified 56 households with at least one adult and one child, a total of 176 persons. There are many causes of homelessness; among the causes are the lack of affordable housing, physical and mental illness that make it difficult to earn a living, domestic violence situations and chronic substance abuse. The 2019 PIT identified only 1 Veteran household with a child; however, the 2019 Yuba/Sutter Veterans Stand Down reports assisting 97 homeless Veterans region-wide at their annual Stand Down event. The Yuba/Sutter Veterans Stand Down Office assists homeless Veterans on a daily basis with housing assistance and supportive services. During 2019, the Veterans Stand Down Office assisted approximately 380 homeless Veterans with housing assistance and supportive services. Many of these homeless Veterans have children in the household but there is no specific information if the homeless Veterans were families with children or were single adults. Regardless of the type of households, the causes for homelessness are like those of non-Veteran households.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The homeless population counted by the 2019 PIT was primarily White, non-Hispanic. Persons declaring White as their race made up 76% of the homeless population. Blacks or African Americans made up 6%

of the homeless population, persons declaring themselves as American Indian or Alaskan Native made up 7%, 1% declared as Asian and less than 1% declared as Native Hawaiian or other Pacific Islander. Non- Hispanic or Non-Latino persons made up 90% of the homeless population, 10% were Hispanic or Latino.

The homeless population is disproportionately White, Black, Native American and Non-Hispanic as compared to the Yuba/Sutter population as a whole.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The 2019 PIT provides the most recent information about the nature and extent of sheltered and unsheltered homeless in the Yuba/Sutter Area. The PIT was conducted by the Yuba-Sutter Homeless Consortium and their partners and volunteers in January 2019. The 2019 PIT identified 202 persons in emergency shelters; of the homeless persons residing in emergency shelters, 97 persons were in families with children. Included in those 202 persons in emergency shelters were 27 persons having a serious mental illness; 34 persons were adults with substance abuse issues and 19 were adult victims of domestic violence. There were 519 unsheltered persons; unsheltered persons included 79 persons in families with children. Included in those 519 unsheltered persons were 86 adults with a serious mental illness; 64 adults with a substance abuse issue; and 31 adult victims of domestic violence. There were no persons counted as residing in transitional or safe haven shelters.

Service providers have seen a higher incidence of homeless seniors recently than in past years due to a lack of affordable housing. The 2019 PIT for the Yuba Sutter region reported 161 homeless seniors, age 55 and older.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

This section evaluates the special housing needs and supportive services for special needs populations. Special needs populations discussed in this section include seniors, disabled households (including physical, mental and the developmentally disabled), female-head of households, large families and farmworkers within the City.

Describe the characteristics of special needs populations in your community:

Seniors, 65 years and older, make up 13.8% of the City's population according to the 2013-2017 ACS 5-Year Estimates. Fifty-five percent of seniors are females and 45% are males. Approximately 75% of all senior households are owner households and 25% are renter households. Twenty-three percent of owner households are experiencing a cost burden as compared to 69% of renter households. According to the 2013-2017 ACS 5-Year Estimates, 42% of seniors 65 and older have some type of disability. The incidence of disabilities increase with older seniors, 75 and older, 51% report some type of disability. Senior households are considered a special needs group because the majority of seniors are considered low-income. Median Social Security payments for the area are \$10,800 for a single person household and \$18,000 for a couple.

Disabled households include persons with physical disabilities, mental illness and developmental disabilities. The 2013-2017 American Community Survey estimates 12.9% of the City's population have some type of disability. Seniors account for the largest percentage of disabled persons due to age related disabilities.

FREED Center for Independent Living office located in Yuba City serves the needs of people with disabilities living in Yuba, Sutter and Colusa counties. Their services include information and assistance to access a broad range of disability and aging services and supports, independent living skills training, housing assistance, including minor home repairs and modifications for safety and independence, peer support, personal assistance support, individual and systems advocacy, nursing home transition, youth transition, transportation support, traumatic brain injury services, Internet and computer access, assistive technology including provision of wheelchairs and other durable medical equipment for consumers. FREED estimates they serve approximately 600 clients annually.

Alta California Regional Center serving the Sutter, Yuba, and Colusa County region provides case management and referral services for developmentally disabled clients. Alta Regional estimates serving approximately 1200 clients, including both adults and children annually.

Sutter/Yuba Behavioral Health provides mental health services to Sutter County and Yuba County residents including Yuba City. During FY 2018/19 they report assisting 4869 behavioral health clients. These clients have a range of diagnoses including depression, anxiety, bipolar disorder, and

schizophrenia among others. Most patients are low income and do not have private insurance. The majority of clients served are 18-59 years old; however, youth and seniors also make up a portion of their clientele.

Female-headed households make up 10.9% of all households in the City; 6.2% of all households are female-headed households with children. Female-headed households are considered a special needs group because of the higher incidence of poverty in this type of household as compared with all households. The 2013-2017 American Community Survey estimates 28.6% of all female-headed households are below the poverty level, as compared to 15% of all households. The incidence of poverty increases in female headed households with children. Female headed households with children make up 37% of families below the poverty level.

Large families, as identified by the 2013-2017 American Community Survey, consist of a 4-or-more-person household which makes up 31.4% of all households in the City. Twenty eight percent of large households are owner occupied households and 35.5% are renter households. Large households are considered a special needs group because of their need for larger housing units. Larger households experience a higher incidence of overcrowding, especially in lower income households.

Domestic Violence Victims as well as sexual assault, stalking and human trafficking victims are served by Casa de Esperanza, (Casa). Casa reports receiving 1,205 calls for service for domestic violence victims during 2019; 515 were single persons and 690 were family households. During 2019 Casa received 555 sexual assault calls for service; 322 were single persons and 233 were family households.

What are the housing and supportive service needs of these populations and how are these needs determined?

The housing and supportive service needs identified in this section were determined through consultation with service providers and advocacy groups and/or by reviewing census data, websites, the City's 2013 Housing Element and other agency plans.

Seniors have numerous housing and supportive needs. The Area 4 Agency on Aging serves a seven-county area including Yuba City. The Area 4 Agency on Aging 2016-2020 Area Plan identifies the needs of seniors. More and more seniors have expressed a desire to age in place. Regardless of their housing situation, low-income seniors need supportive services including meals, legal services, personal care assistance and transportation. Other service needs may be programs providing elder abuse prevention and caregiver respite. Housing costs are the single largest expense for everyone, but can be a bigger challenge for seniors that must exist on a fixed income. Many low-income seniors need affordable housing to maintain a stable living situation and economic independence. Ideally, seniors should not pay more than 30% of their income for housing costs.

Seniors also develop physical disabilities resulting in mobility and self-care limitations. FREED Center for Independent Living serves disabled clients. A majority of their clients are seniors whose disabilities are age-related. Age-related disabilities interfere with the ability to remain independent. Disabled seniors need assistance with home repairs, home maintenance, accessibility modifications and in-home supportive services.

Although seniors have a variety of housing options, including: independent living, assisted living, residential care facilities and skilled nursing facilities, the facilities providing a higher level of care are expensive. Lower-income seniors cannot afford to take advantage of housing options that offer the supportive services associated with assisted living facilities. Most, if not all, affordable senior housing is independent living and does not provide supportive services such as housekeeping, meals, transportation, assistance with medication, etc. Consequently, lower income seniors may remain in independent living situations and struggle with mobility and self-care needs.

Disabled households are in need of a variety of housing options and supportive services depending on the disability. All advocacy groups for disabled clients agree the greatest unmet need of their clients is affordable housing.

Physically disabled households need affordable housing with accessible features. FREED reported that their clients are most in need of accessibility modifications including grab bars, threshold ramps, kitchen and bathroom modifications and assisted technology. FREED also encouraged developers of housing to consider “visitability” when designing houses. “Visitability” is different from “Universal Design” and incorporates into the design three basic features, a zero-step entrance, doors with 32 inches of clear passage space and one bathroom on the main floor that is wheelchair accessible. FREED staff encouraged this type of design because it does not impact the value or sale of the home, but provides disabled and senior persons who use wheelchairs and walkers the ability to live and visit the home.

Alta Regional also stated that developmentally disabled clients are in need of affordable housing. Alta Regional staff reported developmentally disabled clients have issues with landlords maintaining the housing and responding to requests for needed repairs. Developmentally disabled persons can often work and live independently, but need more job opportunities within the community and close to their housing.

Behavioral health clients need a variety of housing types. Some patients require institutional care and/or hospitalization, while others can live independently in the community with care and support as needed. Sutter/Yuba Behavioral Health reports the greatest need of behavioral health clients is affordable housing close to services. Behavioral health clients with families find it especially difficult to locate suitable, affordable housing due to limited incomes. Behavioral health clients also need transitional housing. Due to their illness, Behavioral health clients may find themselves homeless and need assistance with security deposits, utility deposits and credit check fees. They also find it difficult to

secure housing due to rental history and bad credit as a result of their illness.

Female-headed households need affordable housing, transportation, educational programs, job training and employment services. Those female-headed households with children also need affordable housing in areas near childcare, schools and parks.

Large families need larger affordable housing units with adequate bedrooms to accommodate all family members.

Domestic Violence Victims are typically displaced and need housing assistance in order to stabilize their situation. Types of housing assistance needed include both emergency and transitional housing. Sexual assault, stalking and human trafficking victims may also require housing assistance. Casa de Esperanza (Casa) provides emergency shelter assistance to domestic violence and sexual assault, stalking and human trafficking victims. There is no transitional housing available to Casa clients at the present time. In addition, Casa's facility was damaged by fire in 2016. What had been a 48-bed facility located in Sutter County became a 24-bed facility in Yuba County. Four years later Casa is looking to return to its Sutter County site; however, a return to Sutter County will not increase the number of beds. Sutter County will require the number of beds remain at 24. The original 48 beds were insufficient to meet the needs of the domestic violence and sexual assault victims in the service area and 24 beds falls far short of meeting the needs of Casa clients. In addition, Casa previously needed more program space and that has not changed.

Domestic violence victims also need supportive services including legal assistance, counseling, advocacy, job training and education. These needs are currently being met at the emergency shelter by Casa or are provided by their partners. Sexual assault, stalking and human trafficking victims may also need supportive services.

Casa identified the greatest unmet needs of domestic violence, sexual assault, stalking and human trafficking victims as additional emergency shelter beds, transitional housing and program space for provision of client services. Casa also identified an unmet need for jobs and childcare.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the California Department of Health, Office of AIDS, 2018 AIDS Surveillance In California Report, Sutter County has 97 cases of HIV. The Report does not include estimates of the number of persons who are infected but not yet diagnosed. Education and testing are important because the initial infection may present no symptoms for years, allowing the infected person to pass HIV to others unknowingly.

In addition to education and testing, HIV patients may need housing assistance, better access to medical

and dental services, assistance with medical and drug costs, in-home care assistance, transportation, alcohol and substance abuse treatment, as well as psychological support.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The public facility needs are wide ranging and include construction or rehabilitation of senior centers, youth centers, centers and public facilities for the disabled, childcare centers, homeless facilities, adult day care centers, mental health care facilities, health care facilities, general community centers, parking facilities, fire and police stations.

How were these needs determined?

The public facility needs were determined by consultations with City staff as well as public and private service providers.

Describe the jurisdiction's need for Public Improvements:

The public improvement needs are also wide ranging and include street improvements, sidewalks, water/sewer improvements, storm water/drainage improvements, ADA/accessibility improvements, lighting, neighborhood cleanup, parks and playgrounds, landscape improvements. The majority of public improvement needs are located within lower income neighborhoods.

How were these needs determined?

Public improvement needs were determined by consultations with City staff.

Describe the jurisdiction's need for Public Services:

New or expanded public service needs include supportive services for, seniors, disabled, youth, homeless, substance abuse, mentally ill and domestic violence victims. Additional public service needs are transportation, education, job training, tenant/landlord counseling, childcare, health, legal and food.

How were these needs determined?

The public service needs were identified through consultation with public and private service providers.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The City experienced a moderate growth in population and housing development between 2015 and 2019. Beginning in 2008 housing development was slowed, if not stopped, as a result of the housing crisis and economic slow-down. In addition, the City experienced a significant impact related to foreclosures during the economic downturn. In the last few years, the economy has rebounded along with the housing market.

The City's housing remains more affordable than nearby cities; however, there is insufficient housing affordable to lower-income households. Many very low-income households cannot find suitable, affordable housing. Many households are experiencing a cost burden, putting them at risk of homelessness.

Older, existing housing stock is typically more affordable to lower income households, but those older homes may be in need of repair due to the fact that lower income households do not have the resources necessary to address health and safety defects or deferred maintenance issues.

There are 2 Public Housing projects located within the City limits owned and operated by the Regional Housing Authority. The Public Housing units are older, but in overall good condition. The Housing Authority has completed some renovations on the units; however, additional work is needed, especially energy efficiency measures and water conservation devices. Demand for housing assistance has remained in high demand as evidenced by number of applicants on the Regional Housing Authority's waiting list for Housing Choice Vouchers and Public Housing.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

This section examines the number and type of housing units in the City; the number of affordable housing units, whether the available housing meets the needs of the population and whether certain housing types are needed.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	15,635	68%
1-unit, attached structure	1,015	4%
2-4 units	1,710	7%
5-19 units	1,760	8%
20 or more units	1,770	8%
Mobile Home, boat, RV, van, etc.	1,205	5%
Total	23,095	100%

Table 25 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	80	1%	310	3%
1 bedroom	120	1%	1,650	17%
2 bedrooms	1,800	15%	3,875	40%
3 or more bedrooms	10,235	84%	3,790	39%
Total	12,235	101%	9,625	99%

Table 26 – Unit Size by Tenure

Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

According to the most recent inventory of assisted housing affordable to low and moderate-income households, the City has a total of 679 units of affordable housing. The City does not own any of the affordable units, the units are either owned by the Regional Housing Authority (RHA), a non-profit or privately owned. The majority of the 679 are affordable to low and very low-income households; 52 of the units are set aside as senior/disabled housing and 259 of the units are set aside as farmworker housing. In addition to the units noted above, the RHA manages 641 Housing Choice Vouchers within the City's limits.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Housing Element law requires jurisdictions within California to identify affordable rental housing units eligible to convert to market rate housing within 10 years of the beginning of the 8-year planning period of the Housing Element. The City's most recent Housing Element planning period began in October, 2013; therefore, the Housing Element assessment identified units with affordable housing contracts expiring by October, 2023 and conversion of affordable units to market rate units is possible.

The 2013 Housing Element identifies two projects within the City at risk of converting to market rate. Those projects are Sutter Village and Park Terrace Apartments. Sutter Village Apartments is 74-unit apartment project owned by a for-profit entity. Sutter Village has Project Based Section 8 assistance, the Section 8 contract is renewed annually. Park Terrace Apartments is an 80-unit apartment project with several types of funding; Section 236, Low Income Housing Tax Credits (LIHTC), HOME Investment Partnership Program (HOME). Park Terrace is owned and managed by Mercy Housing, a non-profit affordable housing provider. The Housing Element reports the Section 236 loan affordability requirements for Park Terrace will expire in 2016 and puts the project at risk of conversion; however, the affordability requirements for the LIHTC require affordability through 2055 and therefore the project is not at risk.

Does the availability of housing units meet the needs of the population?

The 2013-2017 American Community Survey 5-Year Estimates data shows the City has a total of 23,416 housing units, a 0.10% increase in housing units as reported in the 2010 U.S. Census. According to the 2013-2017 ACS 5-Year data, 71% of housing units are single-family structures (including duplexes and townhouses), approximately 24% are multifamily structures (two or more units per structure) and the remaining 5% are mobile homes and trailers. Ninety-five percent (95%) of all housing units are occupied and 5% are vacant. Reasons for vacant units range from units vacant - for rent, vacant - for sale, seasonal/recreational units and migratory worker housing. In other words, not all units included in the 5% vacancy rate above are available to rent. Likely the vacancy rate is closer to 2% if you consider units vacant and for rent only. Service providers that assist lower income households indicate their clients have a difficult time securing housing due to the lack of affordable rental housing. The types of housing available may not meet the needs of lower income households and specific populations and is discussed below.

Approximately 52% of the City's housing supply is owner-occupied and 48% renter- occupied. The percentage of owner occupied units has decreased from 2011 to 2017 from 57% percent to 52%. Although the number of rental units has increased slightly, those units may not be affordable to lower income households. The majority of owner-occupied homes are 2 or 3-bedroom units, the majority of renter- occupied units are 2 and 3 bedroom units as shown in Table 32.

Describe the need for specific types of housing:

Additional multi-family and single-family affordable housing is needed to accommodate those households who are now experiencing a cost burden and living in overcrowded situations. Based on housing provider statements, especially needed are additional multi-family units targeted to very low-income households. Housing providers state that they are finding it more and more difficult to secure affordable housing for their clients. The need for affordable housing is also demonstrated by the Housing Choice Voucher (HCV) Rental Assistance and Public Housing waiting lists. The Regional Housing Authority reports 1,708 applicants on the HCV waiting list and 2,081 applicants on the Public Housing waiting list.

Special needs populations also require specific types of housing and housing in close proximity to services that address their needs. All service providers who advocate on behalf of special needs populations identified a serious need for affordable housing, but many have specific needs. Disabled households, including those with developmental and mental disabilities, need accessible housing, proximity to services and transit and the availability of group living opportunities. Female heads of household need housing located near child-care facilities, schools, parks and transit. Large-families require multifamily housing with more bedrooms than typically available in more affordable multifamily projects. Seniors need accessible housing and in-home support services.

Discussion

In early 2000 through 2007, the City experienced significant growth in housing development. The growth experienced in the first part of the decade slowed substantially as a result of the decline in the housing market beginning in 2008. The housing market has recovered during the last five-year period; however, the increases in purchase prices and rental costs have worked against lower income households. Lower income households find it almost impossible to purchase a home when purchase prices increase. Low vacancy rates and increased rental rates have made it more and more difficult for lower income households to secure affordable housing as reported by the housing providers in the Yuba City area. Economic downturns, increases in mortgage rates and/or environmental conditions like droughts could impact future development.

The Sacramento Area Council of Governments (SACOG) allocates a “fair share” of the region’s projected housing needs to each city and county. The Regional Housing Needs Allocation (RHNA) plan is required by state law and is part of the statewide statutory mandate to address future housing needs. The allocations are provided per household income group and are for the upcoming housing element planning period January 2021 through October 2029. The RHNA Plan allocated 3,308 new housing units to the City for the planning period 2021-2029. Of the 3,308 total housing units, 756 units are to be affordable to very low-income households, 455 units affordable to low-income households, 622 units affordable to moderate income and 1,475 units affordable to above moderate-income households.

This planning process is not an accurate assessment of the actual needs of the City's residents by income groups, but that the City's goals, policies and objectives will insure housing for all economic segments of the community.

The biggest challenge to addressing the demand for affordable housing is the lack of available funding. The State eliminated Redevelopment Agencies in 2012. The Redevelopment 20% Housing Set Aside was the primary funding source the City had to fund affordable housing projects. Without the Redevelopment housing funds the City will continue to find it difficult to assist financially in the development of new affordable housing in the future. Developers of new affordable housing projects will have to rely on Federal and State funding sources that are competitive and may be difficult to secure.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

This section examines the cost for both purchase and renter housing. This section then compares the cost of housing versus affordability by income level and whether there is a sufficient amount of housing affordable at all income levels.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	271,400	197,100	(27%)
Median Contract Rent	717	785	9%

Table 27 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	1,095	11.4%
\$500-999	5,710	59.3%
\$1,000-1,499	2,400	24.9%
\$1,500-1,999	355	3.7%
\$2,000 or more	68	0.7%
Total	9,628	100.0%

Table 28 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	215	No Data
50% HAMFI	785	550
80% HAMFI	4,765	1,725
100% HAMFI	No Data	3,094
Total	5,765	5,369

Table 30 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$670	\$674	\$878	\$1,269	\$1,542
High HOME Rent	\$670	\$674	\$878	\$1,065	\$1,169
Low HOME Rent	\$567	\$608	\$730	\$842	\$940

Table 31 – Monthly Rent
 Data Source: 2019 HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

According to the website RentData.org, as of January 2020, the average rent in the City for a one bedroom apartment was \$674, a two bedroom, \$878 and a three bedroom \$1,269.

Households earning less than 50% of the Household Area Median Family Income (HAMFI) will have a difficult time finding affordable housing. Households earning less than 50% of the median income make up approximately 23% of the households in the City, but only 6% of the City’s housing stock is affordable to very low-income households. Very low-income households do not earn sufficient income to afford to purchase a home and most will need to reside in State or Federally subsidized rental housing in order to achieve affordability or will suffer a severe cost burden, (pay more than 50% of gross income for housing costs).

Households earning 50% to 80% of the HAMFI make up approximately 18% of the households in the City. Based on the CHAS data, there are currently sufficient rental units in the City affordable to this income group. Households earning 50% to 80% of the HAMFI will encounter difficulty finding affordable purchase housing. Households at the lower range of this income group most likely will not be able to afford to purchase a home. The majority of households earning 50% to 80% of the HAMFI are renter households, because they cannot afford to purchase a home.

Households earning 80% to 100% of HAMFI should be able to afford most, if not all, rental housing in the City. Based on the information regarding affordability of purchase housing below, a household earning 100% of HAMFI is able to purchase a median priced house in Yuba City.

According to zillow.com the median price home in the City, as of January 2020, is \$321,765. The maximum affordable purchase price for a low income family of four earning \$51,850 annually, (80% of 2019 median income for a family of four), is \$224,895. Most Low income households will need Federal or State assistance in order to purchase a home. The maximum affordable purchase price for a family of four earning \$64,800 annually (100% of 2019 median income for a family of four), is \$327,333. These affordable maximum purchase prices are based on a 30-year fixed rate loan at the current interest rate of 3.6% and a 5% down payment. The affordable purchase price for households earning 80% of the median income are calculated based on the household paying 30% of their monthly income for housing costs. In comparison, the affordable purchase price for households earning 100% of the median income

are calculated based on the household paying 35% of their monthly income for housing costs. The HUD standard is a household should not pay more than 30% of the income for housing costs, however, higher income households may be able to afford paying a higher percentage of the income for housing costs. Mortgage lenders may allow a higher percentage of income going to housing costs, especially if the household's other credit payments (car payments and revolving loan payments) are low.

Interest rates are currently at some of the lowest levels in years due to the effects of the COVID-19 pandemic. The interest rates will most likely increase once the economic conditions resulting from COVID-19 have improved. Increased interest rates will negatively affect the ability of families to purchase homes in the future.

Typically smaller households, such as single person households and female headed-households, may have difficulty purchasing a home.

How is affordability of housing likely to change considering changes to home values and/or rents?

California has seen many highs and lows in the housing market as has Yuba City. It is expected that those highs and lows will continue with a long-term upward trend in housing prices. The upward trend in housing costs will mostly result in a decrease in homeownership. However, housing costs in Yuba City in comparison to other cities in California are some of the most affordable.

Housing prices in the City peaked in early 2005 with the median price house at \$318,000; then declined significantly beginning in 2007 as a result of the housing crisis. In recent years the housing market has rebounded resulting in rising home prices. Housing prices in Yuba City have increased 4% in the past year. The median price house in January 2020 is now at \$321,765. Currently interest rates are low, which has helped to off set increasing housing prices. Should interest rates increase, low-income households, (households earning 80% or less of the median income), would not be able to afford even the most modest home. Depending on the interest rate increase, moderate and higher income households could also be impacted making it difficult for them to purchase a home.

Deptofnumbers.com provides a history of the median gross rent for 2006 through 2017 in Sutter County including Yuba City. Rental costs remained relatively steady during the 10 year period 2006 through 2016. However, in 2017 the median rent increased from \$936 in 2016 to \$1011 in 2017, an 8% increase. The supply of rental housing has not kept up with demand driving up the cost of rental housing. Multifamily housing is typically the most affordable housing to lower income households. Additional multifamily housing has not been constructed during the last five years. It is expected that rents will continue to increase, unless the supply of rental housing, especially multifamily housing is increased. If the limited supply of rental housing continues it will be difficult if not impossible for lower income households, especially those with poor rental history, credit issues, etc. to compete for available rental units.

Gross rent is defined as contract rent plus the estimated average monthly cost of utilities (electricity, gas, water and sewer) and fuel (oil, kerosene, wood, etc.). Because some rentals include utilities and others don't, gross rent is a way of normalizing the variability.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The area median gross rent of \$1011 in 2017 is higher than the FMR and High HOME rents for 1 and 2 bedroom units, as well as the Low HOME Rents for all bedroom sizes but lower than the FMR and High HOME rent for 3 and 4 bedroom units.

The City will need to encourage and support both for-profit and non-profit developers using Federal and State subsidies, such as Low Income Housing Tax Credits and HOME, to construct housing targeted to households earning less than 50% of median income. Affordable one and two bedroom developments for seniors, disabled households and single parent households are needed, as well as 3 and 4-bedroom multifamily housing for larger family households. The City will also continue its relationship and support the Regional Housing Authority to increase the supply of Public Housing units and Section 8 Housing Choice Vouchers needed to address the affordable housing needs of very low-income households in the City. The City's Housing Rehabilitation Programs will also be another means of maintaining affordable housing stock available to lower income households.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

This section describes the condition of the City’s housing stock and estimates how many housing units may be in need of assistance due to age or condition. It is important to assess the condition of housing since older housing typically is the most affordable to lower income households; however, older units may not meet “standard condition” housing defined below. Older housing typically requires more maintenance and repair adding to the incidence of housing problems among lower income households who do not have resources to make repairs or find alternate housing. Housing built prior to 1980 may contain lead hazards or units with health and safety defects may pose health risks to lower income households as well.

Definitions

The City defines “standard condition” housing as a housing unit that has no health and safety defects and meets HUD Housing Quality Standards; “substandard housing” condition is a housing unit suitable for rehabilitation whose deteriorated conditions can be corrected to meet HUD Housing Quality Standards at a cost not exceeding 50% of the value of the unit. If costs of repairs exceed 50% of the unit value, then the unit is not suitable for rehabilitation and is in need of replacement.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,535	29%	4,970	52%
With two selected Conditions	290	2%	745	8%
With three selected Conditions	0	0%	25	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	8,405	69%	3,885	40%
Total	12,230	100%	9,625	100%

Table 32 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	3,100	25%	1,440	15%
1980-1999	4,295	35%	2,765	29%
1950-1979	3,955	32%	4,220	44%
Before 1950	885	7%	1,200	12%
Total	12,235	99%	9,625	100%

Table 33 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	4,840	40%	5,420	56%
Housing Units build before 1980 with children present	2,815	23%	1,380	14%

Table 34– Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			1533
Abandoned Vacant Units			
REO Properties			10
Abandoned REO Properties			

Table 35 - Vacant Units

Need for Owner and Rental Rehabilitation

Approximately 47% of the City’s housing stock was built prior to 1980 and 53% built after 1980. Approximately 79% of the City’s housing was built prior to 1999. Older housing stock, especially those units constructed prior to 1980, could be in need of repair or rehabilitation.

The 2011-2015 American Community Survey (ACS) data, (Table 32), shows there are 8,505 or 39% of all households with some type of housing condition. Renter households have a higher incidence of housing problems, 52% of all renter households report at least one housing problem in comparison to 29% of all owner-occupied households. Housing conditions reported in this section are similar to housing problems discussed in the Housing Needs Section and include: 1) lack of complete plumbing facilities; 2) lack of complete kitchen facilities; 3) more than one person per room; and 4) cost burden greater than 30%. Therefore, the ACS data in Table 32 does not provide an accurate assessment of the need for housing rehabilitation, given housing problems include cost burden, not just physical housing problems requiring repair. Further examination of the ACS data shows that almost all of the housing in the City has essential services. Less than 1% of housing lacks complete plumbing facilities and less than 1% live in housing that lacks complete kitchen facilities.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

As noted above, an estimated 47% of the City’s housing stock, or 10,260 units, were built prior to 1980 and may contain lead-based paint hazards.

The number of housing units within the City occupied by extremely low, very low, low and moderate-income households with children present, and may contain lead-based paint, is estimated to be 2,072. This number was calculated by multiplying the percentage of low and moderate-income households by the number of housing units in the City built prior to 1980, with children present. Lower income households are more likely to live in older more affordable homes but may not have financial resources to pay for testing and lead paint abatement.

Sutter County Public Health Department administers a Childhood Lead Poisoning Prevention Program that provides outreach and education to prevent lead poisoning and nurse case management for children who are lead burdened in Sutter County. During the Consolidated Planning process the Sutter County Public Health Nurse/Childhood Lead Poisoning Prevention Program Coordinator was contacted to obtain data related to lead-based paint poisoning. The Public Health Nurse stated annually there have been 2 to 6 cases for the period 2017 to 2020 that met State criteria and required full case management services. For cases that met State criteria, a nursing and environmental home investigation is completed to determine the source of exposure. During the same period, 2017 to 2020, there have been 500 to 750 children annually with lead detected in their blood. For these lower levels that don't meet the State criteria, it can be difficult to determine the exact cause because resources do not allow for a full investigation. No level of lead is considered safe. Even a small amount of lead in the blood has been shown to cause issues with growth and brain development. In Sutter County most of the higher-level lead poisoning cases are a result lead-based paint or traditional cosmetics used by recent immigrants to the U.S. (Surma Sindoor, Kohl used by many Middle Eastern cultures).

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

This Section examines the supply and condition of Public Housing. The City does not own or operate any Public Housing units; the Regional Housing Authority (RHA) covers a four-county area, Sutter, Yuba, Nevada and Colusa counties and is the Public Housing Agency that serves the City. The information regarding the number of Public Housing Units and Housing Choice Vouchers in the Tables below are for Yuba City units only.

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers available			123	641	29	569	17	0	26
# of accessible units									

Table 36 – Total Number of Units by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: Regional Housing Authority

Describe the supply of public housing developments:

Describe the number and physical condition of units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The RHA owns and manages Public Housing as well as manages the Housing Choice Voucher (HCV) Program in Yuba City; as noted above, the City does not own any Public Housing units. The RHA serves a multi-county area; 123 of the public housing units owned and operated by the RHA and identified above are located within City limits. Those units include 99 units at Richland Housing and 24 units at River City Manor.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The overall condition of Public Housing units owned and operated by the RHA is good. The PNA for Richland Housing Center states the property is well maintained and is in good overall condition. New renovations had been completed on 12 of the units, including new siding, windows, bathroom, HVAC,

new roofs, water heaters, some kitchen improvements and exterior painting. Fourteen (14) units at 476 Garden Highway (3 buildings) and roofing replaced in 2019. The 14 remaining units have been upgraded on an as-needed basis with new appliances, HVAC replacements and interior finishes at the time units are turned over. The PNA for River City Manor states the property is well maintained and appears to be in good to fair overall condition. In 2019, all windows and vinyl siding were replaced; improvements to the property include roof replacement, re-landscaping of front yards, as-needed appliance and HVAC replacements and as-needed replacement of interior finishes as units are turned over.

The units must pass a Housing Quality Standards (HQS) inspection prior to a new tenant moving in; additionally, HQS Inspections are conducted annually for all Public Housing units and Housing Choice Voucher (HCV) assisted units. The RHA educates voucher holders at the HCV briefings about HQS information, offers suggestions on how to talk to potential landlords about the voucher program and encourages participants to know their rights as tenants. All of these efforts help ensure that voucher holders occupying private rental units are living in safe and decent conditions.

Public Housing Condition

Because the RHA is designated as a small housing authority with less than 250 Public Housing units, the inspections for all units are combined into one score. The Richland Housing Center Average Inspection score above includes all public housing, including Richland Housing, River City Manor and Live Oak Apartments, (Live Oak Apartments is located within Sutter County, but outside the City limits). The most recent inspection by HUD’s Real Estate Assessment Center (REAC) was completed in June 2019. The maximum score is 100 and the average inspection score for all the RHA units was 93, maintaining their high performer status.

Public Housing Development	Average Inspection Score
Richland Housing Center	93

Table 37 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

RHA staff identified the following restoration and revitalization needs for Richland Housing and River City Manor:

Eighty-seven (87) units at Richland Housing need bathrooms remodeled and modern, water conserving toilets, showerheads and faucets installed. The 12 units not previously renovated need new water heaters, HVAC units, double pane windows and kitchens remodeled.

All 24 units at River City Manor units need new flooring, kitchen cabinets and countertops.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The RHA sets goals and objectives in their 5 Year and Annual Plans for improving the living environment of public housing residents. Those goals and objectives include:

- RHA staff will explore the repositioning of the entire 173-unit Public Housing portfolio through the Streamlined Voluntary Conversion process, or the RAD process. RHA staff will recommend to the Board of Commissioners moving forward whichever process is most advantageous and economically feasible to the agency.
- The RHA will continue to utilize Project Based Section 8 Vouchers as a tool to develop new affordable housing units.
- The RHA will work with community partners and Social Service agencies to apply to HUD for Streamlined Section 8 Vouchers for non-elderly disabled households.
- The RHA will work with community partners and Social Service agencies to apply to HUD for the new Foster Youth to Independence (FYI) initiative that will offer Vouchers to PHAs to prevent or end homelessness among young adults under the age of 25 who are, or have recently left, the foster care system without a home to go to.
- The RHA will apply to HUD Headquarters, when applicable, for a waiver on the cap on Project Based Vouchers, to increase that cap to up to 50% total (including the 10% for special needs projects).

The RHA continues to increase the availability of safe, decent, affordable and suitable housing free from discrimination. The RHA has partnered with local City and County administrations to create innovative housing opportunities for low-income families within the jurisdiction. The RHA is always working towards their goal of providing safe, decent, affordable housing. Their FSS programs for both Housing Choice Voucher and Low-Income Public Housing will continue to provide participants with a variety of programs and support services that promote self-sufficiency.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

This section describes facilities and services targeted to homeless persons and mainstream services that also support homeless persons. The information contained in this section was obtained through consultation with the Sutter-Yuba Homeless Consortium and the 2019 Point In Time count.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Housing Beds	Supportive Housing Beds
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	104	30	0	0	0
Households with Only Adults	108	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	29	0
Unaccompanied Youth	0	0	0	0	0

Table 38 - Facilities and Housing Targeted to Homeless Households

Data Source Comments: Sutter-Yuba Homeless Consortium- Continuum of Care

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The Sutter-Yuba Homeless Consortium is a comprehensive “continuum of care” service system for homeless with a broad range of collaborating participants in the community. The Sutter-Yuba Homeless Consortium Continuum of Care Resources Guide lists mainstream services that also serve homeless individuals and families. Those services include domestic violence and sexual assault services, crisis intervention, drug and alcohol, health services, disability services, employment services, provision of food, Veterans services and legal assistance.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The City does not provide services directly, but as noted previously, is working within the framework of the Sutter-Yuba Homeless Consortium to provide homeless services and address facility needs. It should be noted that because of the regional, cooperative effort between Sutter-Yuba jurisdictions and service providers, the City's homeless persons are able to avail themselves of shelters and housing services on a region-wide basis. Assistance available to homeless individuals and families within the service area of the Sutter-Yuba Homeless Consortium include motel vouchers, assistance with rent and security deposits and utilities, emergency shelters, transitional shelters and case management. The following agencies and organizations provide services and facilities to homeless persons, including families, veterans, chronically homeless and youth:

- Salvation Army
- Casa de Esperanza
- Twin Cities Rescue Mission
- Regional Emergency Shelter Team
- Central Valley Homeless Veterans Assistance Program
- Sutter County Health and Human Services
- Yuba County Health and Human Services
- Sutter County 1 Stop
- Yuba County 1 Stop
- Sutter-Yuba Behavioral Health Services
- Hands of Hope
- Bridges to Housing
- Harmony Health
- Ampia Health
- Adventist Health
- Michael Protho & Associates Family Counseling
- Yuba Sutter Arts
- California Rural Legal Assistance
- Social Security
- Narcotics Anonymous
- Alcoholics Anonymous
- Regional Housing Authority

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

This section addresses the supportive housing needs of non-homeless special needs populations. The City does not provide services directly but does use a portion of its Community Development Block Grant funds to address the supportive housing needs of non-homeless special needs populations.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Supportive housing needs vary by population. Supportive housing needs include transitional housing and permanent supportive housing along with case management services. Independent, affordable housing is also needed, but special needs populations like the elderly, frail elderly and disabled, may need in home care, housekeeping, medications and/or transportation. Independent living situations accompanied by in-home services for the elderly and disabled are not affordable to lower income households. Housing types like congregate care and assisted living are not typically offered as part of senior/disabled affordable housing.

The City does not provide supportive housing for special needs populations but relies on public and private agencies specializing in the needs of their targeted populations to provide services and coordinate housing. All of the service providers consulted during the development of the Consolidated Plan indicated a need for additional supportive housing and/or affordable housing targeted to their specific population served. In addition, funding for new or expansion of supportive services connected to the housing is needed.

The supportive housing needs are also discussed in the Non-Homeless Special Needs Assessment Section and Public Housing Needs Assessment Sections of the Consolidated Plan.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The City is not in a position to implement a Discharge Coordination Policy and relies on the Sutter-Yuba Homeless Consortium and its member agencies to address the needs of those likely to become homeless after being discharged from a public institution or care facility.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

As noted above, the City does not provide housing or supportive services but will provide funding to service agencies that address the housing and supportive services needs of non-homeless special needs populations.

The City will make available to service providers Community Development Block Grant funding for special needs activities; for example, the FREED Accessibility Improvement Program and Handyman Program that assists disabled and senior households.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Not applicable as the City is not an entitlement/consortia grantee.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City's 2013-2021 Housing Element, (2013 Housing Element), provides a detailed analysis of potential barriers to affordable housing development, including local, State and Federal governmental constraints, market constraints and environmental constraints. The following provides a summary of discussion contained in the City's 2013 Housing Element:

Governmental Constraints

Governmental constraints include the regulatory functions that are basic to the role of local government; however, there is much debate about whether or not these regulations discourage the availability of housing to people of all income levels.

Land Use Regulations:

The land use categories contained in the City's General Plan, (Low Density Residential, Medium Density Residential and High Density Residential), provide for residential grown at various density levels.

Zoning requirements for setbacks, lot coverage and parking are not perceived as a constraint to housing development in the City.

Permits and Fees:

The 2013 Housing Element concludes that permits and fees in the City are low in comparison to most other cities in the Sacramento region and do not represent a significant financial constraint to housing development. The City Council has recently approved a reduction in Development Impact Fees within the existing City Limits to equal the Infill Development Impact fees in order to encourage housing development

Infrastructure:

The provision of on-site improvements, such as streets, curbs, gutters, sidewalks, landscaping, water and sewer are standard conditions of approval. In many cases, off-site improvements and/or mitigations may also be required to accommodate development. These off-site improvements might include street widening, traffic signals, public utility easements or flood control improvements. Both on-site and off-site improvements are incorporated into the total project costs discussed under Market Constraints below.

Development Review Process:

The City's development review guidelines work to ensure a streamlined project review process and ensure fairness and consistency in the development review process. The City's development and design review processes are not perceived as a barrier to development.

Building Code and Enforcement:

The City's building codes represent basic construction standards within the State of California and thus do not place an undue burden on the construction or rehabilitation of affordable housing.

Reasonable Accommodation and Housing for Persons with Disabilities:

In accordance with California State SB 520, the 2013 Housing Element analyzes potential and actual government constraints specifically on development of housing for persons with disabilities. The Americans with Disabilities Act (ADA) is supported at the State and local level. The City follows State codes, which are more restrictive than Federal codes.

In conformance with the passage of SB 520, the City has evaluated its zoning code, building code and permit processing procedures for compliance with ADA guidelines. Using the SB 520 Analysis Tool, staff found no significant barriers to the development, maintenance and improvement of housing for persons with disabilities. Answers to the questions contained in the Analysis Tool are kept on file and will be periodically updated as required.

The City does not have an official provision for reasonable accommodation, (modifications or exceptions to zoning laws and other land use regulations which make it easier for persons with disabilities to gain access to housing). The 2013 Housing Element identifies a program for adopting a reasonable accommodation ordinance scheduled for completion during the current Housing Element cycle. At this time staff report an informal policy to "do whatever possible to assist" persons with disabilities to have access to housing.

Market Constraints

Market constraints significantly affect the cost of housing and can pose barriers to housing production and affordability.

Vacant/Underdeveloped Land:

The availability of vacant land does not appear to be a constraint on future development in the City.

Residential Land Costs:

Due to a wide availability of land in the Yuba City area, developers do not compete for new properties and land is cheaper on average than in the rest of the State.

Site Development Costs:

Development costs (infrastructure costs) do not appear to be a constraint to the construction of housing in the City.

Construction and Soft Costs:

Construction and soft costs are comparable to those of surrounding communities and do not appear to be a constraint to the construction of housing in the City.

Availability of Financing:

Financing is readily available to credit worthy contractors and residential developers for projects in the City. Current interest rates are low, but vary depending on the loan term and down payment. In general, credit-worthy buyers in the City do not have difficulty obtaining loans.

Environmental Constraints

Environmental phenomena such as flooding and seismicity present a minor constant risk to the City, but are not considered constraints to housing development. Nowhere in the City is development precluded; environmental constraints can be mitigated through appropriate residential design.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

This section addresses non-housing community development needs, including economic development needs. The section analyzes the jobs versus workforce and education or job training needs.

Economic Development Market Analysis

This section of the Plan describes the City's economic development asset needs, whereas the Needs Assessment section of this Plan, specifically NA-50 (Non-Housing Community Development Needs), described the City's needs for public facilities, improvements and services.

Yuba City is located near the Feather River at the base of the Sutter Buttes—known as the smallest mountain range in the world. Just 40 miles north of Sacramento, Yuba City is the agricultural, economic and social hub of the Yuba-Sutter region. Providing a unique blend of urban amenities and small-town charm, Yuba City's historic downtown is the perfect backdrop for shopping, entertainment and community events.

Industry

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	2,025	856	10	5	-5
Arts, Entertainment, Accommodations	2,334	2,460	11	15	3
Construction	1,289	840	6	5	-1
Education and Health Care Services	4,044	3,595	20	22	2
Finance, Insurance, and Real Estate	909	745	4	4	0
Information	261	172	1	1	0
Manufacturing	1,568	1,183	8	7	-1
Other Services	682	602	3	4	0
Professional, Scientific, Management Services	1,188	705	6	4	-2
Public Administration	0	0	0	0	0
Retail Trade	3,113	3,486	15	21	6
Transportation and Warehousing	783	201	4	1	-3
Wholesale Trade	812	471	4	3	-1
Total	19,008	15,316	--	--	--

Table 39 - Industry

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	30,250
Civilian Employed Population 16 years and over	25,995
Unemployment Rate	14.11
Unemployment Rate for Ages 16-24	42.73
Unemployment Rate for Ages 25-65	7.50

Table 40 - Labor Force

Data Source: 2011-201 ACS

Occupations by Sector	Number of People
Management, business and financial	5,005
Farming, fisheries and forestry occupations	1,405
Service	3,340
Sales and office	6,115
Construction, extraction, maintenance and repair	3,470
Production, transportation and material moving	1,380

Table 41 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	16,070	66%
30-59 Minutes	5,345	22%
60 or More Minutes	3,110	13%
Total	24,525	100%

Table 42 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,140	1,075	2,240
High school graduate (includes equivalency)	5,290	525	2,325
Some college or Associate's degree	8,580	625	2,980
Bachelor's degree or higher	4,470	235	1,095

Table 43 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	80	480	930	1,920	1,695
9th to 12th grade, no diploma	1,220	945	845	1,335	870
High school graduate, GED, or alternative	2,155	2,655	2,100	3,425	2,070
Some college, no degree	2,810	2,990	2,070	3,840	1,800
Associate's degree	300	880	890	1,700	940
Bachelor's degree	310	820	1,090	2,245	845
Graduate or professional degree	0	235	435	1,050	520

Table 44 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	18,845
High school graduate (includes equivalency)	27,464
Some college or Associate's degree	31,903
Bachelor's degree	51,250
Graduate or professional degree	70,363

Table 45 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The major employment sectors within the City are: Education and Health Care Services, (21.3%); Retail Trade, (16.4%); and Arts, Entertainment, Accommodations (12.3%).

Describe the workforce and infrastructure needs of the business community:

The three major employment sectors in the City, (Education and Health Care Services, Retail Trade, and Arts, Entertainment and Accommodations), all have available job opportunities and are in need of qualified employees.

The City's roots are agriculturally based. Agricultural jobs typically require lower educational levels and are low-paying; however, the City has evolved over the years and now has a diversity of business and professional services. The City has become an employment center for the Yuba-Sutter Metropolitan Statistical Area (MSA) and a bedroom community to Sacramento, the California state capital. The City's businesses need educated and skilled employees. As the economy improves and businesses look for new opportunities to open or expand in the City, they may need assistance with location options, permitting, regulatory and environmental issues, employee training and recruitment.

In order for the City to attract additional manufacturing the City will need to increase zoning for light industrial and provide the needed infrastructure.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

In 2008 the City adopted a Economic Development Strategy and Work Plan. However, the subsequent economic downturn resulted in local, state and federal impacts. The downturn in the economy significantly impacted both commercial and residential investment in the City. The State eliminated both Redevelopment Agencies and Enterprise Zones, two key assets and tools planned for in the City's 2008 Economic Development Strategy to assist business growth. Since the initial Economic Development Strategy and Work Plan in 2008, the City has updated the Work Plan, most recently in 2018. The City's updated economic development strategy identifies several goals that will encourage both job and business growth.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The 2013-2017 American Community Survey estimates that 16% of the City's population over the age of 25 has a high school diploma. Almost 11% of the population has a bachelor degree or higher. The skills and education of the City's current workforce do not necessarily correspond to the employment

opportunities in sectors with labor shortages. Education and Health Care Services and Arts, Entertainment and Accommodations often require a higher level of education, such as an Associate, Bachelor, Graduate or Professional degree. The labor force that cannot find employment in their business sector due to labor surpluses may need additional education or a different skill set in order to obtain employment in sectors with labor shortages.

Educational opportunities include Yuba City Community College and numerous private institutions offering post-secondary education and business/vocational programs. Within an hour's drive are universities including: UC Davis, Cal State Sacramento and Cal State Chico.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The North Central Counties Consortium (NCCC) provides workforce development services to local businesses and job seekers in conjunction with Sutter County One Stop. Yuba College also offers economic and workforce development programs.

The NCCC is formed under a joint powers agreement to administer the federally funded Work Force Investment Act in Sutter, Yuba, Glenn and Colusa Counties. NCCC is governed by a governing Board composed of one member of the Board of Supervisors from each member county and a Workforce Investment Board, comprised of business leaders and representatives from labor, education, economic development, community based organizations and One Stop delivery system partners.

Sutter County One Stop offers a variety of assistance to low income and special needs population job seekers including job training, job search and placement assistance, and career assessment and planning.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

The City of Yuba City is a member of the Yuba-Sutter Economic Development Corporation (YSEDC) and will be included in the regional YSEDC Comprehensive Economic Development Strategy.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

In addition to the City's participation in the regional CEDS the City's Economic Development Commission developed the Economic Development Strategic Work Plan updated in 2018. The Plan highlights three key initiatives: 1) Grow our Image - create a positive and inspiring self-image; 2) Grow our Businesses – focus on key assets and resources that encourage investment, job creation and delivery of goods and services; and, 3). Grow our People – provide educational opportunities that develop a quality

workforce. The Plan will help address the needs identified in the Consolidated Plan with regard to education, job training, employment opportunities.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Housing problems as identified by HUD in the Consolidated Plan include: unit lacks complete kitchen facilities; unit lacks complete plumbing facilities; overcrowding, more than one person per room; and, cost burden, paying more than 30% of income toward housing costs.

As noted in the Needs Assessment Section, the most common housing problem for the City's households is cost burden. Approximately 39% of the City's residents experience a cost burden; 6% are living in overcrowded housing and approximately 3% of households live in substandard housing, housing that does not have complete plumbing and/or kitchen facilities. There are no areas where multiple housing problems are concentrated.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Racial/Ethnic Minority Concentrations:

For purposes of analyzing concentrations of racial or ethnic minorities, an area is considered to have a concentration if, compared to the City as a whole, there is a 20% higher number of racial or ethnic minorities within the area.

An estimated 29.2% of the City's residents are Hispanic. In comparison, Hispanic residents make up approximately 65.5% of residents in Census Tract 503.02, 49% of residents in Census Tract 502.02 and 36.9% of residents in Census Tract 501.01.

Low-Income Households:

For purposes of analyzing concentrations of low-income households, an area is considered to have a concentration if more than 50% of the households are low-income (80% or less of the HAMI).

Approximately 41% of the residents of the City are low-income. Census Tract 502.01 block groups 1 and 2, 66% and 61%, respectively, of residents are low-income; Census Tract 502.02, 59% of residents are low-income; Census Tract 501.02, 69% of residents are low-income.

What are the characteristics of the market in these areas/neighborhoods?

Characteristics of the market within the areas that contain concentrations of racial/ethnic minorities and low-income households are higher percentages of residents experiencing a cost burden, higher percentages of renter households versus owner households and older housing stock that may be in need of health and safety repairs and/or may contain lead paint hazards.

Are there any community assets in these areas/neighborhoods?

The areas identified above are among the City's oldest neighborhoods and community assets are limited. The 2010-2015 Neighborhood Revitalization Strategy took a comprehensive approach to addressing assets such as neighborhood parks through the Neighborhood Clean Up Program, improving landscaping, and playground areas, as well as adding picnic tables in these older neighborhoods. The City expects to continue to identify and develop assets as part of its efforts to improve the housing and infrastructure in these areas.

Are there other strategic opportunities in any of these areas?

As noted, the areas of racial/ethnic minorities and low-income households are a priority for the City as well as the residents in these areas. Actions identified in the Consolidated Plan include the development of affordable housing opportunities, housing rehabilitation, collaborations with non-profit organizations, improve accessibility between neighborhoods and local businesses, construction and/or rehabilitation of recreation or community facilities.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

High speed Internet access that is consistent, reliable, and affordable is critical infrastructure to fully participate in today's environment. Communities without broadband, the residents, businesses, institutions providing health care, education, and emergency response, are technologically and socially isolated without it. Broadband access can be provided either through a hard-wired connection to a modem device, or through an individual's smartphone and cellular service.

According to the 2018 American Community Survey (2018 ACS) 72% of the households (22,524) have Internet subscriptions that are able to connect to the Internet via a home-based high-speed connection and a personal computing device. Another 13.3% of households were able to connect to the Internet at home on their smartphones only.

Describe the broadband needs of housing occupied by low- and moderate- income households based on an analysis of data, identified by the jurisdiction, for its low- and moderate-income neighborhoods.

Based on the research conducted, there are no neighborhoods identified as having broadband needs. According to the 2018 ACS, 69.5% households (22,524) have a subscription to the Internet, while 12.9% have no Internet access. Of the total households only 4.5% earning less than \$20,000 and adults between the ages of 18 to 64 have no Internet access.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

There are 15 Internet providers in the City with 9 of those offering residential service. In terms of coverage options, the average home in the City has 3-4 companies serving their address; only 2.91% of City residents are limited to one or fewer options for broadband service. Outside of the services listed below, XFINITY from Comcast is another option to consider; they have wired broadband in 97% of the Yuba City area. Wireless providers like Succeed.Net and satellite Internet providers are sometimes a good choice.

As a result of the prevalence of fiber, broadband Internet average download rates around the City are 46.84% above the California average; however, not all "Fiber" connections reach the subscriber address. Viasat Internet (formerly Exede) is the most widely available option in the City; they are available to close to 100% of the City. HughesNet is the most likely second choice, serving virtually 100% of local addresses with predominantly Satellite service.

MA-65 Hazard Mitigation

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The Sutter County Local Hazard Mitigation Plan (LHMP) which includes Yuba City, developed by the Sutter County Office of Emergency Management(OEM), is the County's hazard mitigation guidance document and provides a comprehensive description of Sutter County's historical and current hazard analysis, mitigation strategies, goals, and objectives. The LHMP was developed to make the County and its residents less vulnerable to future hazard events. Sutter County OEM is in the process of updating the LHMP.

Section 4 of the current LHMP provides a Risk Assessment of potential natural hazard events in the Sutter County Planning Area, including hazards specific to Yuba City. The Plan relies on data from the California Emergency Management Agency (CAL EMA), FEMA, the National Oceanic and Atmospheric Administration and many other sources to assess the significance of hazards to the Planning Area to identify previous hazard events and assess the probability of future hazard events. The Plan identifies the following hazards: Severe Weather (Extreme Cold/Freeze, Extreme Heat, Fog, Heavy Rain, Hailstorms, Lightning, and Winds, Tornados); Dam Failure; Drought and Water Shortages; Earthquake; Earth Movement (Erosion, Landslide); Flooding (100/200/500 year, Localized Storm Water); Invasive Species; Levee Failure; Marine Invasive Species; Volcano; Wildfire. Climate change affects frequency, duration and economic impacts of hazards such as Severe Weather, Drought and Water Shortages, Flooding, Invasive Species, and Wildfires.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Residents can use the State of California's MyHazards internet mapping tool at <https://myhazards.caloes.ca.gov> to develop hazard risk assessments for their specific address or a citywide basis. The website identifies hazard risks for the location and provides recommendations the resident can take to minimize injury and damage to home and property.

The Sutter County LHMP does not specifically address the vulnerability of the identified risks to housing occupied by low- and moderate- income households. As noted in the previous section, the plan is in the early stages of being updated and will include an analysis of impacts based on social/economic criteria.

The LHMP identifies the following risk hazards specific to Yuba City. The impact is more significant to lower income residents for a variety of reasons, including age, disabilities, addiction, housing condition, lack of resources, and homelessness.

Dam Failure Vulnerability

The most significant risk from flooding in Yuba City results from the potential for dam or levee failure. There are six dams located upstream of Yuba City on the Feather and Yuba River. Failure of any one of these dams could cause significant flooding in the City.

Drought and Water Storage Vulnerability

The vulnerability of Yuba City to drought is region wide, but impacts may vary and include reduction in water supply, agricultural losses, and increase in dry fuels. Drought impacts are wide-reaching and may be economic, environmental and/or societal.

Earthquake Vulnerability

Earthquake vulnerability is primarily based on population and the built environment. Urban areas in high seismic hazard zones are the most vulnerable, while uninhabited areas are less vulnerable. Earthquake losses will vary across the Sutter County Planning Area depending on the source and magnitude of the event. Sutter County, including Yuba City is located in a relatively low seismic area and earthquake hazard is of low significance; however, Earthquakes have occurred on fault systems in the region and depending on the magnitude could result in ground motion in the City.

100/500 Year Flooding Vulnerability

Flooding in California is widespread and the second most frequent disaster source. Since 1950, floods have accounted for the second highest combined losses and the largest number of deaths. According to www.myhazards.caloes.ca.gov the City is in or near an area of low hazard of flooding and outside a tsunami hazard zone.

A small portion of the City is located inside the 100-year flood zone as defined by the Federal Emergency Management Agency (FEMA). California Department of Water Resources Best Available Maps (BAM) provides the community and residents an additional tool for understanding potential flood hazards not currently mapped as a regulated floodplain and shows the entire City within the 500-year floodplain. The California Department of Water Resources 200-year Map shows all of the City within the 200-year floodplain.

Localized/Storm water Flooding

Drainage and storm water runoff are related issues, contributing to potential flooding, which is the most significant risk to life and property in the City. The greatest potential threat to the Yuba City Urban Area is flooding resulting from failure of levees along the Feather River. In addition to a damaging flood resulting from a dam or levee failure, the Yuba City urban area is highly susceptible to flooding from storm water runoff.

Levee Failure Vulnerability

The most significant risk from flooding in the Yuba City Planning Area results from the potential for dam or levee failure. Overtopping of the Feather River levees is considered to be a significant local concern due to the general topography of the region. The Feather River, which forms the eastern boarder of the General Plan Study Area consists of a large watershed that stretches to the Sierra Crest. The City's location in the lower portions of the watershed exposes the community to substantial risk from riverine flooding. Additionally, riverine flooding can overwhelm the integrity of the local or regional levee system. Levee failure can result if water overtops a levee, if high river levels saturate the levee banks, or if the levee itself is structural defective. Levee failure can occur very rapidly with little warning. Once a levee is breached, floodwaters can inundate large low-lying areas. Levee overtopping or failure could cause catastrophic flooding in the City.

Wildfire Vulnerability

The Plan's analysis of wildfire vulnerability determined it to be a low significance hazard; however, due to the significance of wildfires in California, the vulnerability of wildfires is included. Yuba City is not immune to numerous types of grass and brush fires and any one of them may accelerate into an urban interface wildfire. The urban interface wildfire is one that burns along the urban/rural interface and can result in major losses or property and structures. Such a situation could lead to evacuation of large portions of the population and the potential for significant loss of personal property, structures, and rangeland.

Extreme Cold and Freeze Vulnerability

Extreme cold and freeze is most likely to occur in the winter months of December, January and February. Prolonged exposure to cold can cause frostbite or hypothermia and can become life-threatening. Infants and the elderly, as well the homeless are more susceptible. Pipes may freeze and burst in homes or buildings that are poorly insulated or without heat. Wind chill is also a factor, As the wind increases, it draws heat from the body, driving down skin temperature and eventually the internal body temperature.

Freezing spells are likely to become less frequent in California as climate temperatures increase. While fewer freeze events would decrease cold related health effects, too few freezes could lead to increased incidence of disease as vectors and pathogens do not die off.

Extreme Heat Vulnerability

FEMA defines extreme heat as temperatures that hover 10 degrees or more above the average high temperature for the region and last for several weeks. Heat kills by taxing the human body beyond its abilities. Heat waves do not strike victims immediately, but rather their cumulative effects slowly take the lives of vulnerable populations. Heat waves do not cause damage or elicit the immediate response

of other hazards but they are potentially deadlier. Elderly persons, small children, chronic invalids those on certain medications and persons with weight and alcohol problems are particularly susceptible to heat reactions.

Studies show that California is getting warmer, leading to increased frequency, magnitude and duration of heat waves. These factors may lead to increased mortality from excessive heat.

Disease Outbreaks

As of May 3, 2020, the Yuba-Sutter Area reported 50 confirmed cases of the COVID-19 novel coronavirus, with 3 death toll. Low and moderate-income communities are more vulnerable to disease outbreaks than higher-income communities because of their limited access to health care providers, and the fact that being a member of a vulnerable population is associated with being immunocompromised and more vulnerable to infectious disease. California's governor has requested emergency action from the state Legislature to make funding available for the public response to the outbreak the eventual impact of the COVID-19 outbreak is unclear at this stage, it serves as a warning that these events may increase in frequency and severity in coming years.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan identifies the City's priority needs, anticipated resources for the next five-year period and five-year goals for addressing the priority needs utilizing Community Development Block Grant funds. The Strategic Plan also discusses the five-year strategies the City will undertake to address needs of public housing, barriers to affordable housing, reduction of lead-based paint hazards, reduce poverty and monitor its housing and community development projects and programs to ensure compliance with requirements.

The five-year Strategic Plan is predicated on Community Development Block Grant funds the City will receive annually as an entitlement jurisdiction. The City will pursue other Federal and State funding resources that may become available during the five-year period of the Consolidated Plan to address priority needs; however, those funds will be available on a competitive basis and the City cannot be assured applications will be successful. The City will also support applications for funding by the Regional Housing Authority, Sutter-Yuba Homeless Consortium and public and private service organizations that address the housing and supportive service needs identified in the Consolidated Plan.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

1	Area Name:	Citywide
	Area Type:	Other
	Other Target Area Description:	Other
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
Are there barriers to improvement in this target area?		
2	Area Name:	Qualified Low/Mod Census Tracts
	Area Type:	Low/Mod Areas
	Other Target Area Description:	Low/Mod Areas
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
Identify the needs in this target area.		

	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

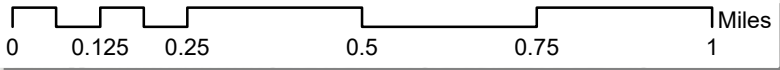
Table 29 - Geographic Priority Areas

General Allocation Priorities

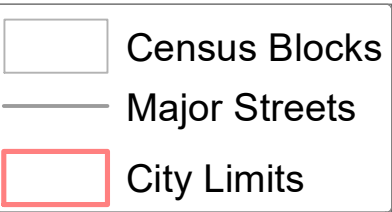
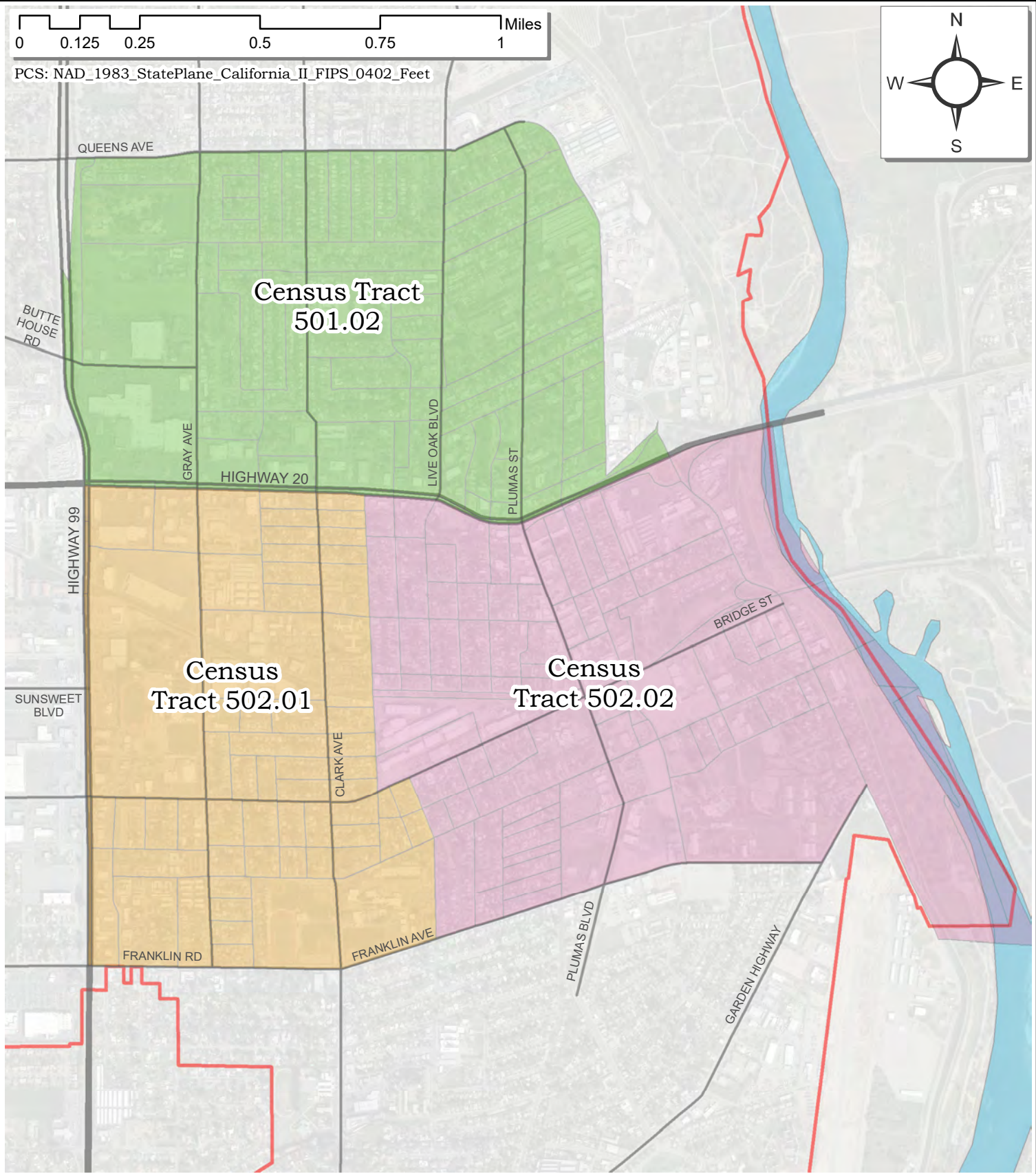
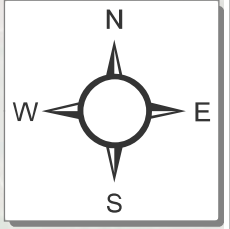
In general, the City will allocate investment of resources on a city-wide basis. The distribution of funding is predicated somewhat on the nature of the activity to be funded. Resources targeted to new construction and preservation of existing housing will be allocated on a city-wide basis. Resources targeted to special needs populations, including homeless, will also be allocated on a city-wide basis, where needs are identified and/or where resources can be coordinated with existing facilities and services. Activities such as public facilities and improvements will be targeted to older, low-income neighborhoods most in need of assistance, (qualified low/mod census tracts). Economic development activities will be targeted to business districts located in qualified low-income areas, industrial parks and commercial sites in various City locations, primarily in the qualified low/mod census tracts.

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

This is not applicable as the City does not receive HOPWA funding.



PCS: NAD_1983_StatePlane_California_II_FIPS_0402_Feet



YUBA CITY CENSUS TRACTS (2010)



SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Priority is assigned based on the level of need that is demonstrated by the data collected during the preparation of the Plan, specifically in the Needs Assessment and Market Analysis; the information gathered during the consultation and citizen participation process; and the availability of resources to address the need.

1	Priority Need Name	Affordable Rental Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	Geographic Areas Affected	Citywide
	Associated Goals	Construction of New Affordable Housing Public Housing Needs

	Description	Activities to address this need may include the use of CDBG funds in combination with other State and Federal funds for the construction, acquisition and/or rehabilitation of affordable rental housing.
	Basis for Relative Priority	Needs Assessment and Market Analysis identifies a need for additional affordable rental housing for lower income households.
2	Priority Need Name	Preservation of existing units
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Physical Disabilities
	Geographic Areas Affected	Citywide
	Associated Goals	Housing Rehabilitation
	Description	Preserve the existing housing stock by offering assistance with correction of health and safety defects, home repairs and accessibility modifications.
	Basis for Relative Priority	Needs Assessment and Market Analysis identifies a need to maintain the existing affordable housing stock and also identifies a need for home modifications and accessibility for disabled and senior populations. Rehabilitation of owner occupied and rental housing will help to preserve the existing affordable housing stock. In addition, accessibility modifications will allow seniors and disabled residents to remain in their homes and live independently.
3	Priority Need Name	Homeless Housing and Supportive Services
	Priority Level	High

	Population	Extremely Low Low Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Citywide
	Associated Goals	Homeless Assistance
	Description	Address the housing and supportive services needs of homeless persons by providing funding to the Sutter-Yuba Homeless Consortium and its member agencies.
	Basis for Relative Priority	Needs Assessment identifies a need for housing and supportive services for the homeless.
4	Priority Need Name	Housing and Supportive Services for Special Needs
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence

	Geographic Areas Affected	Citywide
	Associated Goals	Non-Homeless Supportive Services
	Description	Provide funding to non-profit agencies that provide housing assistance and supportive services to non-homeless special needs populations
	Basis for Relative Priority	Needs Assessment identifies a need for affordable housing and supportive services.
5	Priority Need Name	Public Improvements and Infrastructure
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents Non-housing Community Development
	Geographic Areas Affected	Citywide
	Associated Goals	Infrastructure Improvements/ADA Modifications
	Description	Provide funding to address the need for public improvement located in lower income neighborhoods. Activities may include ADA improvements, lighting, parks and neighborhood clean-up.
	Basis for Relative Priority	Needs Assessment identifies the need for public improvements and infrastructure.
	6	Priority Need Name
Priority Level		High

	Population	Extremely Low Low Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Citywide
	Associated Goals	Public Facilities Construction/Rehabilitation
	Description	Rehabilitation for construction of public facilities including, but not limited to, senior centers, youth centers, centers for the disabled, homeless facilities.
	Basis for Relative Priority	Needs Assessment identifies a need for public facilities.
7	Priority Need Name	Economic Development Opportunities
	Priority Level	High
	Population	Extremely Low Low Non-housing Community Development
	Geographic Areas Affected	Citywide

	Associated Goals	Economic Development/Business Assistance
	Description	Provide economic development assistance activities that may include, but are not limited to assistance to businesses that create jobs or otherwise benefit low-income persons through the provision of education or job training.
	Basis for Relative Priority	Needs Assessment and Market Analysis identified a need for education, job training, employment opportunities for lower income persons, special needs populations and public housing residents.
8	Priority Need Name	Construction of New Affordable Housing
	Priority Level	Low
	Population	Extremely Low Low Large Families Families with Children Elderly Elderly Persons with Physical Disabilities
	Geographic Areas Affected	Citywide
	Associated Goals	Construction of New Affordable Housing
	Description	Provide assistance and support applications for the development of affordable housing units.
	Basis for Relative Priority	Needs Assessment and Market Analysis identified a need for additional affordable housing units for lower income households and supportive housing units for special needs populations. Cost burden is the greatest need identified by lower income households, including special needs populations; however, this need has a low priority because the City does not have funding available to address this need. If this priority need is to be met, the City will need to work with for-profit and/or non-profit housing developers to secure the funding necessary to construct affordable housing units. Due to a lack of funding, no CDBG funds have been allocated to this goal.
9	Priority Need Name	Program Administration
	Priority Level	High

Population	Other
Geographic Areas Affected	Citywide
Associated Goals	Construction of New Affordable Housing Economic Development/Business Assistance Homeless Assistance Housing Rehabilitation Infrastructure Improvements/ADA Modifications Non-Homeless Supportive Services Public Facilities Construction/Rehabilitation Public Housing Needs
Description	Activities include general management, oversight, monitoring of CDBG programs and projects.
Basis for Relative Priority	Staffing required to ensure the City adheres to regulations and requirements associated with CDBG funding.

Table 47 – Priority Needs Summary

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Shortage of affordable rental housing. The City does not anticipate it will offer a TBRA Program during the five-year planning period covered by the Consolidated Plan.
TBRA for Non-Homeless Special Needs	Shortage of affordable rental housing. Demand for housing targeted to special needs populations. The City does not anticipate it will offer a TBRA Program during the five-year planning period covered by the Consolidated Plan.
New Unit Production	Shortage of affordable rental housing affordable to lower-income households. Shortage of affordable purchase housing affordable to low-income households.
Rehabilitation	Shortage of affordable housing. Need to preserve existing affordable housing stock.
Acquisition, including preservation	Shortage of affordable housing. REO, vacant or abandoned units.

Table 48 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The anticipated resources identified in the table below include only those funding sources covered by the Consolidated Plan. The only source of funds covered by the Consolidated Plan the City receives as an entitlement jurisdiction annually is Community Development Block Grant funds.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$666,861	\$4,632	\$637,182.83	\$1,308,675.83	\$2,600,000	Prior Year resources include \$607.71 from 2016 PY, \$191,107.52 from 2018 PY and \$473,047.60 from 2019 PY. Expected amount available remainder of Con Plan is estimated based on a \$650,000 annual grant for remaining 4 years.

Table 49 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Community Development Block Grant (CDBG) funds may not be sufficient to fully fund activities undertaken and are leveraged with a variety of Federal, State funds, charitable organizations and private donations. The CDBG funds do not require matching funds.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the Plan.

There is no publicly owned land or properties located within the City that will be used to address needs identified in the Strategic Plan.

Discussion

In addition to the City's CDBG funds, the City will also have \$500,000 available in State HOME funds for Housing Rehabilitation and First Time Home Buyer programs.

The City operates an Owner-Occupied Housing Rehabilitation (OOR) Program; the amount of Program Income (PI) cannot be predicted due to the fact PI is generated by past loans being paid off and the proceeds deposited into the OOR Program.

The City will aggressively pursue or support applications by other entities for, Federal and State funding over the duration of the 2020-2024 Consolidated Plan to address priority needs; however, other funding sources available to the City or its partners will be through a competitive application process. The City cannot be assured an application(s) will be successful based on the rating and ranking criteria. Should the City be successful in applying for other Federal or State funding sources, the City will be challenged to meet matching requirements, should matching funds be required.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Yuba City	Government	Homelessness Non-homeless special needs Ownership Planning Public Housing Rental	Jurisdiction
Consolidated Area Regional Housing Authority	PHA	Non-homeless special needs Ownership Planning Public Housing Rental	Region
Sutter-Yuba Homeless Consortium	Continuum of care	Homelessness	Region

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The strengths in the delivery system are the communication and collaboration, both interdepartmental and with outside service providers. Gaps in the delivery system are due to a lack of funding needed to address priority needs.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services	X	X	

Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
Other			
Other			

Table 51 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

There are a wide variety of entities, both public and private, that work to serve the City's community and surrounding areas, including low-income residents and special needs populations. The Sutter-Yuba Homeless Consortium and North Central Counties Consortium are examples of area-wide resources that have been brought together to strengthen the delivery system and maximize resources.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Strengths in the delivery system are the collaboration and support among the service providers. Gaps in the delivery system are due to limited funding; the need far surpasses the funding resources; as a result, needs with a high priority may not be addressed.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The Sutter Yuba Homeless Consortium works closely with jurisdictions to address the priority needs. This includes frequent meetings local governments and AdHoc planning committees to address immediate issues. Also, most providers attend monthly meetings to address client needs and refer to services.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Rehabilitation	2020	2024	Affordable Housing	Citywide	Preservation of existing units Program Administration	CDBG: \$250,000	Homeowner Housing Rehabilitated: 15 Household Housing Unit
2	Non-Homeless Supportive Services	2020	2024	Non-Homeless Special Needs	Citywide	Housing and Supportive Services for Special Needs Program Administration	CDBG: \$25,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
3	Homeless Assistance	2020	2024	Homeless	Citywide	Homeless Housing and Supportive Services Program Administration	CDBG: \$500,000	Public service activities other than Low/Moderate Income Housing Benefit: 684 Persons Assisted
4	Infrastructure Improvements/ADA Modifications	2020	2024	Non-Housing Community Development	Qualified Low/Mod Census Tracts	Program Administration Public Improvements and Infrastructure	CDBG: \$1,250,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 8,500 Persons Assisted

5	Public Facilities Construction/Rehabilitation	2020	2024	Non-Housing Community Development	Citywide	Program Administration Public Facilities	CDBG: \$500,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4,000 Persons Assisted
6	Economic Development/Business Assistance	2020	2024	Economic Development	Citywide	Economic Development Opportunities Program Administration	CDBG: \$50,000	Businesses assisted: 3 Businesses Assisted
7	Public Housing Needs	2020	2024	Public Housing	Citywide	Affordable Rental Housing Program Administration	CDBG: \$0	Rental units rehabilitated: 0 Household Housing Unit
8	Construction of New Affordable Housing	2020	2024	Affordable Housing	Citywide	Affordable Rental Housing Construction of New Affordable Housing Program Administration	CDBG: \$0	Rental units constructed: 0 Household Housing Unit

Table 52 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Rehabilitation
	Goal Description	Provide loans and grants for housing rehabilitation activities that benefit extremely-low, very-low and low-income persons.
2	Goal Name	Non-Homeless Supportive Services
	Goal Description	Utilizing Community Development Block Grant funds provide assistance to non-profit organizations for provision of supportive services targeted to non-homeless special needs population (disabled, seniors, families, domestic violence victims)
3	Goal Name	Homeless Assistance
	Goal Description	Utilize Community Development Block Grant funds to assist homeless persons with housing and supportive service needs.
4	Goal Name	Infrastructure Improvements/ADA Modifications
	Goal Description	Utilize Community Development Grant funds for ADA improvements to sidewalks, parks and other public buildings and facilities.
5	Goal Name	Public Facilities Construction/Rehabilitation
	Goal Description	Utilize Community Development Block Grant funds to construct or rehabilitate public facilities, including but not limited to senior centers, youth centers, centers for the disabled and homeless facilities.
6	Goal Name	Economic Development/Business Assistance
	Goal Description	Utilize Community Development Block Grant funds to make loans and grants to small businesses for job creation, technical assistance, or other activities that will benefit low income persons.
7	Goal Name	Public Housing Needs
	Goal Description	Address the needs of public housing, including but not limited to rehabilitation and renovation of existing public housing units.

8	Goal Name	Construction of New Affordable Housing
	Goal Description	Increase the supply of affordable housing units. CDBG funding has not been allocated to this goal or a numeric goal has not been established. The City will need to partner with a non-profit or for-profit developer to secure funding in order to carry out this goal.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Extremely low-income households, (less than 30% of HAMI) – 125 units (housing rehabilitation)

Very low-income households, (less than 50% of HAMI) – 90 units (housing rehabilitation)

Low-income households, (less than 80% of HAMI) – 30 units (housing rehabilitation)

The estimates above are quantitative goals for the five-year period of the Consolidated Plan. As noted above, the City has identified goals including Homeless Assistance (housing), Public Housing Needs and Construction of New Affordable Housing; however, these goals have not been quantified due to a lack of funding at this time. The City may allocate CDBG funding to these goals if resources are available in the future and will continue pursue State and Federal funding to address these goals. However, State and Federal funding will most likely be on a competitive application basis and the City cannot be assured an application(s) will be successful.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The City does not own or operate public housing or have any oversight over the operation of the Regional Housing Authority, (RHA).

Regional Housing Authority staff states there are no current tenants in need of reasonable accommodation/modification nor are there any current tenants waiting to transfer to accessible units; as a result, the City's strategy will be to continue its efforts to maintain a close working relationship with the RHA. Should a need to increase the number of accessible units be identified in the future, it will work with the Housing Authority to address the need to the extent funds are available.

Activities to Increase Resident Involvements

Since the City does not own or operate public housing or have oversight over the Regional Housing Authority operations, there are no strategies directed specifically to public housing tenants. The City encourages all residents to be active participants in their community. The City will cooperate with the RHA where need is determined to accomplish this goal.

Is the public housing agency designated as troubled under 24 CFR part 902?

No.

Plan to remove the 'troubled' designation

Not Applicable.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The City's 2013 Housing Element provides a detailed analysis of potential barriers to affordable housing development, including local, State and Federal governmental constraints, market constraints and environmental constraints. The following provides a summary of discussion contained in the City's Housing Element:

Governmental Constraints

Governmental constraints include the regulatory functions that are basic to the role of local government; however, there is much debate about whether or not these regulations discourage the availability of housing to people of all income levels.

Land Use Regulations:

The land use categories contained in the City's General Plan, (Low Density Residential, Medium Density Residential and High Density Residential), provide for residential growth at various density levels.

Zoning requirements for setbacks, lot coverage and parking are not perceived as a constraint to housing development in the City.

Permits and Fees:

The 2013 Housing Element concludes that permits and fees in the City are low in comparison to most other cities in the Sacramento region and do not represent a significant financial constraint to housing development. The City Council has recently approved a reduction in Development Impact Fees within the existing City Limits to equal the Infill Development Impact fees in order to encourage housing development.

Infrastructure:

The provision of on-site improvements, such as streets, curbs, gutters, sidewalks, landscaping, water and sewer are standard conditions of approval. In many cases, off-site improvements and/or mitigations may also be required to accommodate development. These off-site improvements might include street widening, traffic signals, public utility easements, flood control improvements. Both on-site and off-site improvements are incorporated into the total project costs discussed under Market Constraints below.

Development Review Process:

The City's development review guidelines work to ensure a streamlined project review process and ensure fairness and consistency in the development review process. The City's development and design review processes are not perceived as a barrier to development.

Building Code and Enforcement:

The City's building codes represent basic construction standards within the State of California and thus do not place an undue burden on the construction or rehabilitation of affordable housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Consistent with the 2013-2021 Housing Element, Housing Program Schedule, the City will address the following policies that may act as barriers to the development of affordable housing.

- Amend the zoning code to allow second units in R-2 and R-3 zones per state law—Completed.
- Amend the zoning code to address requirements of AB2634, allowing for single-room occupancy (SRO) housing without a use permit in C zones. SRO housing is one type of housing appropriate for extremely low-income housing and special needs groups—Completed.
- The City will continue to ensure zoning standards and development requirements to facilitate the construction of higher density housing. The City will also encourage development of housing at the higher end of the density range in land designated as low/medium and medium high density through the provision of density bonuses and negotiated alternative parking standards, street improvement standards, maximum density and lot coverage—On-going.
- Develop regulations for condominium conversions that minimize the displacement of lower income residents and prevent the loss of affordable housing units; conversions can be allowable as an opportunity for homeownership for current residents—On-going.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Many homeless need specialized, intensive assistance in order to get back into housing and be linked with services needed for on-going stability. Often homeless persons suffer from mental health conditions, drug or alcohol addiction and chronic physical illnesses, and many have more than one of these conditions, that contribute to their homelessness.

The City does not provide any direct outreach or assessment services for the homeless within the community. The City will continue to work within the framework of and relies on the Sutter-Yuba Homeless Consortium and member agencies to provide outreach and assessment services.

Addressing the emergency and transitional housing needs of homeless persons

The City does not operate any emergency or transitional shelters for the homeless within the community. The City works within the framework of and relies on the Sutter/Yuba Homeless Consortium and member agencies to address the emergency shelter and transitional housing needs of homeless individuals and families. The City will continue to support the provision of emergency and transitional housing through allocation of CDBG funds. The City will also support applications for emergency shelter and/or transitional housing funding by the Homeless Consortium and member agencies, consistent with City policy.

In accordance with State law, the City must provide for emergency shelter and transitional housing sites within the zoning code. The City has amended the zoning code to allow for emergency shelter sites in accordance with state law. During the Consolidated Program planning period the City will amend the zoning code to address transitional housing sites in accordance with State law requirements and consistent with the Housing Element Program Schedule.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The City does not provide supportive services or case management to homeless or formerly homeless persons. The City relies on the Homeless Consortium and its member service providers to address the supportive services and case management needed to help homeless persons' transition to permanent housing, independent living, secure permanent affordable housing and prevent recurring homelessness.

The City will continue to provide CDBG funding for supportive services and case management services for homeless persons. The City will continue to support service providers in their efforts to secure funding for supportive services, case management and the provision of affordable housing.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Individuals and families who are overpaying for rent and utilities are constantly at risk of becoming homeless; therefore, the City will continue its efforts to increase the supply of affordable housing. The City will also continue to support the Homeless Consortium and its member agencies who address the needs of individuals and families at risk of becoming homeless through assistance with security deposits, one-time rental assistance, utility assistance, supportive services and case management services.

The City is not in a position to implement a Discharge Coordination Policy and relies on the Homeless Consortium and its member agencies to address those likely to become homeless after being discharged from a public institution or care facility.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The City will continue to implement HUD's lead-based paint regulations. Efforts by the City in this regard include the disclosure of possible lead hazards and implementation of lead risk assessment, clearance testing procedures and supervision of lead-related work performed in conjunction with any of its housing programs. Any mitigation or removal of lead-based paint hazard is in accordance with HUD guidelines.

How are the actions listed above related to the extent of lead poisoning and hazards?

Within Sutter County there have been 2 to 6 cases of lead poisoning that met the threshold to require investigation and referral to the State for the period 2017 to 2020. For the same period, there have been 500 to 750 cases of lead detected in the blood every year but these cases do not meet the threshold requiring an official investigation. It was noted that any amount of lead in the body should be of concern. The Public Health Nurse stated that most cases of lead poisoning that meet the threshold for investigation are a result of lead-based paint. The City recognizes that there is a particular need to protect children under the age of six who are most susceptible to poisoning. The City works to disseminate information on lead hazards. The programs and activities undertaken by the City adhere to State and Federal laws governing prevention of lead poisoning.

How are the actions listed above integrated into housing policies and procedures?

Guidelines for the City's various housing programs include provisions for inspection and mitigation of lead-based paint hazards for housing built prior to 1978 in accordance with HUD regulations.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Poverty has many causes: Among the causes are disabilities, (physical and developmental disabilities, chronic diseases, mental illness, etc.), a lack of adequate education or vocational training, a lack of sufficient spousal support and substance abuse problems. According to the 2013-2017 American Community Survey 17.6% of the City's population resides in poverty.

The City has forged cooperative relationships with public and private organizations that share a common mission for improving the quality of life for lower income individuals through housing, social services, employment and skills training, neighborhood revitalization and economic development.

The Yuba-Sutter Economic Development Corporation (EDC) partners with local jurisdictions, U. S. Department of Agriculture and local lending institutions to make loans available to businesses for the purpose of providing financing to existing and start-up businesses helping to ultimately create and/or retain jobs for low-income residents.

Sutter County offers residents and businesses assistance through their Human Services, Employment Services including: job screening, vocational training, employment counseling and placement.

Sutter County One-Stop provides residents with employment opportunities, education and training, in addition to providing local businesses hiring, training and human resource assistance.

The Regional Housing Authority, through the Family Self Sufficiency (FSS) Program, provides rental assistance and support programs in order to allow households on the Section 8 Housing Choice Voucher Program to become free of public assistance.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The City's strategy will focus on coordinating resources in conjunction with housing programs and land use policies contained in the Consolidated Plan. The City will assist households with identifying and accessing various housing, social service, educational/vocational programs, business development programs, through collaborative efforts with local agencies such as EDC, Sutter County and the Regional Housing Authority. The City will continue land use policies that seek to balance the creation of jobs and housing, ensure a variety of jobs with varying levels of skill and training and include development of affordable housing.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City will monitor its performance through the Consolidated Annual Performance and Evaluation Report (CAPER). Each year the City will review and report progress it has made in carrying out its Strategic Plan and Annual Action Plan. The CAPER will include a description of resources made available, investment of available resources, geographic distribution and location of investments, results/outcomes, actions taken to affirmatively further fair housing and any other actions taken during the Program Year (PY) as outlined in the Annual Action Plan.

Throughout the PY the City will utilize the Integrated Disbursement and Information System (IDIS) for setting up, funding, drawing down and reporting Community Development Block Grant and other funds as required. IDIS reports will be incorporated into the CAPER and made available to the public as required.

The City will utilize a performance measurement system to ensure accurate reporting of results in IDIS and in the CAPER for the programs and projects undertaken by the City during the PY.

In addition to the HUD monitoring and reporting requirements, the City will undertake the following monitoring program for its housing and community development programs and projects:

- The City will review and report annually to the State Department of Housing and Community Development on the progress the City has made in implementing its Housing Element.
- The City will annually monitor sub-recipients to ensure compliance with federal and local requirements outlined in the agreements. The monitoring will include site visits and a review of files, including documentation of federal overlay requirements.

The City will annually monitor assisted housing projects for compliance with affordability requirements.

2020-2021 ANNUAL ACTION PLAN

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Anticipated Resources

The anticipated resources identified in the table below include only those funding sources covered by the Consolidated Plan. The only source of funds covered by the Consolidated Plan the City receives as an entitlement jurisdiction annually is Community Development Block Grant funds.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$666,861	\$4,632	\$637,182.83	\$1,308,675.83	\$2,600,000	Prior Year resources include \$607.71 for 2016 PY, \$191,107.52 from 2018 PY and \$473,047.60 from 2019 PY. Expected amount available remainder of Con Plan is estimated based on a \$650,000 annual grant for remaining 4 years.

Table 53 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Community Development Block Grant (CDBG) funds may not be sufficient to fully fund activities undertaken and are leveraged with a variety of Federal, State funds, charitable organizations and private donations. The CDBG funds do not require matching funds.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

There is no publicly owned land or properties located within the City that will be used to address needs identified in the Strategic Plan.

Discussion

In addition to the City's CDBG funds, the City will also have \$500,000 available in State HOME funds for Housing Rehabilitation and First Time Home Buyer programs.

The City operates an Owner-Occupied Housing Rehabilitation (OOR) Program. The amount and availability of Program Income (PI) cannot be predicted due to the fact that PI is generated by past loans being paid off and the proceeds deposited into the OOR Program.

The City will aggressively pursue or support applications by other entities for, Federal and State funding over the duration of the 2020-2024 Consolidated Plan to address priority needs; however, other funding sources available to the City or its partners will be through a competitive application process. The City cannot be assured an application(s) will be successful based on the rating and ranking criteria. Should the City be successful in applying for other Federal or State funding sources and matching funds be required, the City will continue to struggle to meet future matching requirements.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goal Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeless Assistance	2020	2024	Homeless	Citywide	Homeless Housing and Supportive Services	CDBG: \$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 684 Persons Assisted
2	Housing Rehabilitation	2020	2024	Affordable Housing	Citywide	Preservation of existing units	CDBG: \$85,000	Homeowner Housing Rehabilitated; FREED, Minor Home Repair and Habitat for Humanity, Exterior Home Repair Programs: 68 Households
3	Affordable Rental Housing	2020	2024	Rental Housing	Citywide	Public Housing Needs	CDBG \$25,000	Rental Housing Rehabilitated: 1 Housing Unit
4	Infrastructure Improvements/ADA Modifications	2020	2024	Non-Housing Community Development	Citywide	Public Improvements and Infrastructure	CDBG: \$287,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12,736 Persons Assisted
5	Public Facilities Construction/Rehabilitation	2020	2024	Non-Housing Community Development	Citywide	Public Facilities	CDBG: \$100,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 800 Persons Assisted

Table 54 – Goals Summary

Goal Description

1	Goal Name	Homeless Assistance
	Goal Description	Activities include Sutter-Yuba Homeless Consortium-Homeless Coordinator, A Hand Up Ministry-Food provisions for the homeless, Bridges to Housing-Homeless Assistance, Central Valley Homeless Veterans, Hands of Hope-Day Shelter, The Salvation Army provides rental assistance and supportive services to homeless individuals and households and the Sutter County Homeless Shelter, provides year-round emergency shelter services to single males and females experiencing homelessness. This 40-bed shelter also provides case management, housing navigation, and Peer Mentorship.
2	Goal Name	Housing Rehabilitation
	Goal Description	Activities include Habitat for Humanity Exterior Home Repair Program, FREED-Minor Home Repair/Modification Program and the City's Owner-Occupied Housing Rehabilitation Program.
3	Goal Name	Affordable Rental Housing
	Goal Description	Activities include Richland Public Housing Apartments; rehabilitation of one (1) Public Housing rental unit.
4	Goal Name	Infrastructure Improvements/ADA Modifications
	Goal Description	Activities include installation of ADA accessible ramps, curb cuts and gutters.
5	Goal Name	Public Facilities Construction/Rehabilitation
	Goal Description	Activities include rehabilitation/renovation of neighborhood parks, replacement of playground structures and ADA improvements of public facilities.

Projects

AP-35 Projects – 91.220(d)

Introduction

This section identifies activities the City will undertake during the 2020-2021 Program Year (PY) with Community Development Block Grant (CDBG) funds.

Projects

#	Project Name
1	Program Administration; 21A – General Program Administration
2	Sutter-Yuba Homeless Consortium, Homeless Services Coordination; LMC, 05 – Public Services
3	Habitat for Humanity – Exterior Home Repair Program; LMH, 14A - Rehab; Single-Unit Residential
4	FREED Home Repair/Modification Program; LMH, 14A - Rehab; Single-Unit Residential
5	Richland Public Housing Apartment Rehabilitation; LMH, 14B – Rehab, Multi-Unit Residential
6	Maple Park Playground Equipment Installation; LMC, 03 - Public Facilities and Improvements
7	ADA Sidewalk and Curb Cut Installation; LMC, 03L - Sidewalks

Table 55 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The activities funded during the 2020-2021 PY are consistent with priority needs identified in the Strategic Plan. Lack of funding is the greatest obstacle to addressing underserved needs. The City has \$666,861 in CDBG funds available for the PY. The City received slightly over \$723,000 in funding requests. In addition, the CDBG Program puts a cap on the amount of funds that can be spent on Public Services. The City is limited from spending more than 15% of its annual allocation, plus program income, on public service activities; as a result, some activities are not funded at the full amount requested.

AP-38 Project Summary

Project Summary Information

1	Project Name	Program Administration; 21A - General Administration
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation Non-Homeless Supportive Services Homeless Assistance Infrastructure Improvements/ADA Modifications Public Facilities Construction/Rehabilitation
	Needs Addressed	Program Administration
	Funding	CDBG: \$133,372
	Description	General administration, oversight and management of Community Development Block Grant Program.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	1201 Civic Center Blvd., Yuba City, CA
	Planned Activities	Administration, management, implementation and monitoring of activities funded by Community Development Block Grant funds.
	2	Project Name
Target Area		Citywide
Goals Supported		Homeless Assistance
Needs Addressed		Homeless Housing and Supportive Services
Funding		CDBG: \$100,000
Description		The Sutter-Yuba Homeless Consortium, in collaboration with Hands of Hope, Bridges to Housing, The Salvation Army, Central Valley Homeless Veterans Assistance Program and Sutter County Homeless Shelter provide services to the homeless population in Sutter and Yuba Counties. In addition, it will be acting as the lead agency and fiscal agent in providing services and programs, in conjunction with five (5) other non-profit agencies, to the City's homeless population.

	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	A combined total of 684 persons from all six (6) awarded agencies, Sutter-Yuba CoC, Bridges to Housing, Hands of Hope, Central Valley Homeless Veterans Assistance, The Salvation Army and the Sutter County Homeless Shelter.
	Location Description	Citywide
	Planned Activities	Continuum of Care Homeless Coordinator Salary; One-time security deposit assistance for homeless re-housing; assistance for homeless veterans to secure permanent housing; assistance for day shelter for homeless families; and rental assistance and supportive services provided by The Salvation Army. Additional services provided by Hands of Hope include showers, laundry facilities, clothes closet, computer access as well as referral and advocacy services and day-to-day operational services provided by the Sutter County Homeless Shelter.
3	Project Name	FREED Home Repair Program; LMH, 14A - Rehab; Single-Unit Residential
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Preservation of existing units
	Funding	CDBG: \$25,000
	Description	Provide accessibility improvements and minor home repairs for low-income disabled and senior residents.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	60 individuals
	Location Description	Citywide
	Planned Activities	The Program will provide health and safety related home accessibility modifications to low-income disabled City residents, including seniors. The Program will allow disabled individuals and seniors to remain living safely and independently in their home.
4	Project Name	Exterior Home Repair Program
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Preservation of existing units

	Funding	CDBG: \$60,000
	Description	The Program will provide preventative home maintenance or critical home repair services to low-income City homeowners.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated this activity will provide assistance to 8 households.
	Location Description	Habitat for Humanity Yuba/Sutter is located at 202 D Street, Marysville.
	Planned Activities	Provide either preventative home maintenance or critical home repair services that will serve homeowners in Yuba City earning 31-80% of the median income. Many of the families that are expected to be served are seniors on a fixed income, disabled, veterans or a combination of these demographics, and meet an immediate need for them.
5	Project Name	Richland Public Housing Apartment Rehabilitation, Building A; LMH, 14B – Rehab Multi-Unit Residential
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Affordable Rental Housing
	Funding	CDBG: \$25,000
	Description	Interior rehabilitation of one (1) Public Housing unit located in a senior apartment complex.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	2 low-income persons
	Location Description	476 Garden Highway, Yuba City, CA
	Planned Activities	Funds will be used to rehabilitate the interior of one (1) Public Housing rental unit at the Richland Public Housing Apartments; this is a 14-unit senior apartment complex.
6	Project Name	Maple Park Playground Equipment Replacement; LMC, 03F – Parks, Recreational Facilities
	Target Area	Qualified Low/Mod Census Tracts
	Goals Supported	Public Facilities Construction/Rehabilitation

	Needs Addressed	Public Facilities
	Funding	CDBG: \$100,000
	Description	Using CDBG funds to replace the playground equipment at Maple Park; the park is located in a Qualified Low/Mod Census Tract.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	800 City residents.
	Location Description	Between Orange Street and Maple Avenue, Yuba City, CA
	Planned Activities	Funds will be used to improve and refurbish the playground equipment; as a result, residents in this neighborhood will enjoy a safer playground.
7	Project Name	ADA Sidewalk and Public Facility Improvements; LMC, 03L – Sidewalks
	Target Area	Qualified Low/Mod Census Tracts
	Goals Supported	Infrastructure Improvements/ADA Modifications
	Needs Addressed	Public Improvements and Infrastructure
	Funding	CDBG: \$223,489
	Description	Provide sidewalks and improvements to public facilities allowing ADA accessibility.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	12,736 persons.
	Location Description	Qualified Low/Mod Census Tracts
	Planned Activities	Provide safe passage for individuals with disabilities by installing new curb, gutter, and ADA compliant sidewalks/ramps.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

In general, the City will allocate investment of resources on a city-wide basis. The City will allocate a portion of its funding to the Qualified Low/Mod Census Tracts.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	40
Qualified Low/Mod Census Tracts	40

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As noted above, the City allocates the majority of funding on a city-wide basis; however, the distribution of funding is predicated somewhat on the nature of the activity to be funded. Resources targeted to new construction and preservation of existing housing will be allocated on a city-wide basis.

Resources targeted to special needs populations, including homeless, will also be allocated on a city-wide basis, where needs are identified and/or where resources can be coordinated with existing facilities and services.

Activities such as public facilities and improvements will be targeted to areas identified as Qualified Low/Mod Census Tracts; these are those older, low-income neighborhoods within the City most in need of assistance.

Economic development activities will be targeted to business districts located in qualified low-income areas, industrial parks, and commercial sites in various City locations.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

This section provides estimates on the number of homeless, non-homeless and special needs households to be provided affordable housing during the Program Year and the number of affordable housing units that will be provided by program type. The estimates do not include the provision of emergency shelter, transitional shelter or social services.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	68
Special-Needs	2
Total	70

Table 57 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	
The Production of New Units	0
Rehab of Existing Units	2
Acquisition of Existing Units	2
Total	4

Table 58 - One Year Goals for Affordable Housing by Support Type

Discussion

Goals contained in the Consolidated Plan are to increase the supply of affordable housing through Housing Rehabilitation and construction of new affordable housing units. The City does not anticipate it will provide rental assistance or acquire existing housing units during the five-year planning period covered by the Consolidated Plan. The City will support both public and private agencies and non-profit and for-profit housing developers in their efforts to increase the supply of affordable housing to homeless, non-homeless and special needs populations.

AP-60 Public Housing – 91.220(h)

Introduction

The purpose of this section is to outline actions the City will take to address the needs of public housing. The City does not own or operate Public Housing or have any oversight over the operation of the Regional Housing Authority (RHA); therefore, the City will act to continue its efforts to maintain a close working relationship with the RHA supporting their actions to address the needs of Public Housing.

Actions planned during the next year to address the needs to public housing

As noted above, the City does not own or operate any public housing in the City. The RHA serves the City. During the Program Year, the City will continue its close working relationship with the RHA to expand housing opportunities for the City's residents.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Since the City does not own or operate public housing or have oversight over RHA operations, there are no actions directed specifically to Public Housing tenants.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The RHA is not designated as “troubled”.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

This section identifies the actions the City will take during the 2020-2021 Program Year (PY) to address homelessness. The City's goals are to address chronic homelessness by assisting transitional housing programs that provide on-going supportive services such as case management, education and job training to help ensure that people do not return to homelessness. The City will also provide assistance to homeless persons and low-income families at risk of becoming homeless.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City does not provide any homeless services; however, the City does work in partnership with the Sutter-Yuba Homeless Consortium and Continuum of Care to address homelessness. Annually the Sutter-Yuba Homeless Consortium conducts a Point-in-Time (PIT) count. The PIT provides valuable information, including demographic and living situation information that allows service providers and the community to better identify and evaluate the homeless population and their needs. During the PY the City will provide CDBG funds to the Sutter-Yuba Homeless Consortium and its efforts to address homeless needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

During the PY the City will allocate a portion of CDBG funds under the Public Service Category to organizations that provide emergency shelter and transitional housing services to the homeless. The City will provide CDBG funding to the Sutter-Yuba Continuum of Care who is acting as the lead agency for all six (6) non-profit agencies to address the needs and provide services to the homeless population. Funding for two of the service providers are for the Sutter County Homeless Shelter for day-to-day operational services and to Hands of Hope for Hands of Hope that provides showers, laundry facilities, clothes closet, computer access as well as referral and advocacy services.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City will provide CDBG funding for several organizations that serve the homeless, including families

with children and veterans. In conjunction with the Sutter-Yuba Continuum of Care, organizations that will be assisted during the PY are: Bridges to Housing; assists homeless or about to be homeless families with one-time financial assistance, (security deposits, utility deposits, etc.), referrals, case management and on-going support to ensure they do not become homeless again. Central Valley Homeless Veterans Assistance Program; assists Veterans with one-time financial assistance, (security deposits, utility deposits, first month's rent, and etc.), and other supportive services. Central Valley Homeless Veterans Assistance Program is a supporter of the Yuba-Sutter Veterans Stand Down event held annually.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City's efforts during the PY to prevent homelessness will include affordable housing programs that maintain the existing affordable housing stock or increase the number of affordable housing units available to low-income households. As noted above, the City will also support housing programs that address the underlying reasons for homelessness and provide on-going support services for formerly homeless families and programs that provide assistance to low-income families at risk of becoming homeless, such as the Bridges to Housing Program.

Discussion

In addition to resources available to and controlled by the City, organizations within the community for which their mission is to provide services to the homeless may receive funds from a variety of federal, state and local sources. These funding sources include Emergency Solutions Grant (ESG), Emergency Food and Shelter Program, (EFSP, FEMA), and Continuum of Care-Supportive Housing Program, (SHP), charitable organizations and private donations. Throughout the PY the City will work closely and support the efforts of the Sutter-Yuba Homeless Consortium to address the housing and supportive needs of the homeless.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City's Housing Element provides a detailed analysis of potential barriers to affordable housing development, including local, State and Federal governmental constraints, market constraints and environmental constraints. The following provides a summary of discussion contained in the City's Housing Element:

Governmental Constraints

Governmental constraints include the regulatory functions that are basic to the role of local government; however, there is much debate about whether or not these regulations discourage the availability of housing to people of all income levels.

Land Use Regulations:

The land use categories contained in the City's General Plan, (Low Density Residential, Medium Density Residential and High Density Residential), provide for residential grown at various density levels.

Zoning requirements for setbacks, lot coverage and parking are not perceived as a constraint to housing development in the City.

Permits and Fees:

The 2013 Housing Element concludes that permits and fees in the City are low in comparison to most other cities in the Sacramento region and do not represent a significant financial constraint to housing development. The City Council has recently approved a reduction in Development Impact Fees within the existing City Limits to equal the Infill Development Impact fees in order to encourage housing development

Infrastructure:

The provision of on-site improvements, such as streets, curbs, gutters, sidewalks, landscaping, water and sewer are standard conditions of approval. In many cases, off-site improvements and/or mitigations may also be required to accommodate development. These off-site improvements might include street widening, traffic signals, public utility easements, flood control improvements. Both on-site and off-site improvements are incorporated into the total project costs discussed under Market Constraints below.

Development Review Process:

The City's development review guidelines work to ensure a streamlined project review process and ensure fairness and consistency in the development review process. The City's development and design review processes are not perceived as a barrier to development.

Building Code and Enforcement:

The City's building codes represent basic construction standards within the State of California and thus do not place an undue burden on the construction or rehabilitation of affordable housing.

Reasonable Accommodation and Housing for Persons with Disabilities:

In accordance with California State SB 520, the Housing Element analyzes potential and actual government constraints specifically on development of housing for persons with disabilities. The Americans with Disabilities Act (ADA) is supported at the State and local level. The City follows State codes, which are more restrictive than Federal codes.

In conformance with the passage of SB 520, the City has evaluated its zoning code, building code, and permit processing procedures for compliance with ADA guidelines. Using the SB 520 Analysis Tool, staff found no significant barriers to the development, maintenance and improvement of housing for persons with disabilities. Answers to the questions contained in the Analysis Tool are kept on file and will be periodically updated as required.

The City does not have an official provision for reasonable accommodation, (modifications or exceptions to zoning laws and other land use regulations which make it easier for persons with disabilities to gain access to housing). The Housing Element identifies a program for adopting a reasonable accommodation ordinance scheduled for completion during the current Housing Element cycle. At this time staff report an informal policy to "do whatever possible to assist" persons with disabilities to have access to housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Consistent with the Housing Element, Housing Program Schedule, the City is addressing the following policies that may act as barriers to the development of affordable housing.

- Amend the zoning code to allow second units in R-2 and R-3 zones per state law – Completed.
- Amend the zoning code to address requirements of AB2634, allowing for single-room occupancy (SRO) housing without a use permit in C zones. SRO housing is one type of housing appropriate for extremely low-income housing and special needs groups-- Completed.
- The City will continue to ensure zoning standards and development requirements to facilitate the construction of higher density housing. The City will also encourage development of housing at the higher end of the density range in land designated as

low/medium and medium high density through the provision of density bonuses and negotiated alternative parking standards, street improvement standards, maximum density and lot coverage—On-going.

- Develop regulations for condominium conversions that minimize the displacement of lower income residents and prevent the loss of affordable housing units; conversions can be allowable as an opportunity for homeownership for current residents—On-going.

AP-85 Other Actions – 91.220(k)

Introduction:

This section addresses the City's planned actions during the 2020-2021 Program Year (PY) to carry out strategies covered in the Consolidated Plan including, fostering and maintaining affordable housing, evaluation and reduction of lead based paint hazards, reduce the number of families within the poverty level and develop the institutional structure and enhancing coordination between public and private agencies that serve low-income and special needs populations.

Actions planned to address obstacles to meeting underserved needs

The greatest obstacle to meeting underserved needs in the City is the lack of funding.. During this PY and the duration of the Con Plan period the City will continue its efforts to identify funding sources, support funding applications by developers and service providers that expand the availability of affordable housing and support applications for homeless assistance and supportive service funds. The City will also implement zoning and land use policies that encourage the development of affordable housing. The City will continue to participate and encourage partnerships between local agencies and organizations so underserved needs may be better met by collaborative use of resources.

Actions planned to foster and maintain affordable housing

The City will continue to offer and/or provide funding for a range of affordable housing activities including single-family housing rehabilitation, multi-family housing rehabilitation and first-time homebuyer programs. The City will work in partnership with private developers, local non-profit agencies and the Regional Housing Authority to develop and preserve affordable housing units.

Actions planned to reduce lead-based paint hazards

The City will continue to implement HUD's lead-based paint regulations that became effective in September 2000. Efforts by the City to reduce lead-based paint hazards include the disclosure to homeowners of possible lead hazards, sponsoring certification training for contractors, implementation of lead risk assessment and clearance testing procedures and supervision of lead-related work performed. In addition, the City will continue to adhere to its Housing Rehabilitation Program guidelines that were amended to stipulate the type and amount of assistance provided and define costs covered under the City's lead reduction program.

Actions planned to reduce the number of poverty-level families

The City will continue its efforts to increase the availability of affordable housing opportunities and assist homeless individuals or those who may be at risk of homelessness. In addition, the City will

implement land use policies that seek to balance the creation of jobs and housing and ensure a variety of employment opportunities requiring varying levels of skills and training.

The City will continue its efforts to develop and maintain cooperative relationships with public and private organizations that share a common mission for improving the quality of life for individuals through housing, social services, employment and skills training and economic development.

Actions planned to develop institutional structure

The City's Development Services Department is the City Department responsible for the administration of the City's Housing Programs, including the Community Development Block Grant (CDBG) Program. The Development Services Department also oversees the City's Community Development activities. The City applies for CDBG funds annually and both internal City Departments and external sub-recipient agencies implement the programs and projects identified in the Annual Action Plan. The Development Services Department will continue to collaborate with other City Departments, the City Council, City Commissions, as well as local agencies and organizations and residents to develop programs and activities that serve low and moderate-income individuals and families within the jurisdiction.

Actions planned to enhance coordination between public and private housing and social service agencies

The City will continue to meet with and maintain a dialog with non-profit agencies and organizations that serve low and moderate-income persons. The City will work to enhance and improve the organizational capacity and foster a collective planning process.

The City will continue to work closely with the Regional Housing Authority to develop, preserve and improve the supply of affordable housing in the City.

Discussion:

Although there are coordinated programs and services to address the needs of lower income households and the homeless, it is recognized that many unmet needs will remain.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

This section identifies any funds, including Program Income, that will be available in addition to the City’s annual CDBG allocation for activities during this the 2020-2021 Program Year.

At a minimum 70% of CDBG funds must benefit low- and moderate-income persons. This Section also identifies the percentage of funds that will be spent on low and moderate-income persons over a specified period of time, 1, 2, or 3 consecutive year period. In a one-year period, if the City cannot meet the minimum 70% benefit, the jurisdiction may elect to accomplish the minimum 70% benefit over a longer period of time, up to 3 years.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	0

Other CDBG Requirements

1. The amount of urgent need activities	0
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Discussion:

The City has determined that 80% of the 2020-2021 PY funds will be expended on low-and moderate-income persons.

Appendix - Alternate/Local Data Sources

City of Yuba City 2013-2021 Housing Element

City of Yuba City 2014 Grow our Economy Strategy

City of Yuba City 2018 Grow the Economy Blueprint Implementation Plan

City of Yuba City Building Division Year End Reports – 2019,2018,2017,2016,2015

City of Yuba City Annual Housing Element Progress Report

Sacramento Area Council of Governments – 2021-2029 RHNA

Agency on Aging/Area 4 2016-2020 Area Plan

California HIV Surveillance Report-2018

HUD 2019 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations – Yuba City & County/Sutter County CoC

www.realtytrac.com/mapsearch/bank-owned-properties/ca/sutter-county

www.deptofnumbers.com/rent/california/sutter-county

www.mortgagecalculator.org/mortgage-rates/california

ATTACHMENT 3



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



Adopted: DRAFT



I. INTRODUCTION

The U.S. Department of Housing and Urban Development (HUD) has a long-standing commitment to the elimination of racial and ethnic segregation and other discriminatory practices. Based on its obligation under Section 808 of the Fair Housing Act, HUD has strongly encouraged the adoption and enforcement of State and local fair housing laws, and the reduction of separation by race, ethnicity or disability status in all of its housing and community development programs. Through its community development programs, HUD seeks to further its goal of increasing equal and free access to residential housing in order to achieve equality of opportunity for all persons regardless of race, color, religion, sex, national origin, disability or familial status.

This document and the related Action Plan are designed to address and fulfill the fair housing requirements of the Consolidated Plan. Federal regulations require participating communities to certify that they are affirmatively furthering fair housing and conducting fair housing planning by:

- Conducting an analysis of the impediments to fair housing choice;
- Taking appropriate actions to overcome the effects of any impediments identified through the analysis, and
- Maintaining appropriate records of the analysis and actions.

The Analysis of Impediments (AI) and any future updates are generally required to be conducted in conformance with the Consolidated Plan time frame. This AI update replaces the City's AI of 2010. Action Plans must respond to the impediments identified in the AI and include milestones, timetables and measurable results for each of the four years following the completion/update of the AI.

City staff and their consultants, Stuart Consulting, are currently preparing the City's 2020 Consolidated Plan and are encouraging citizens, local and regional organizations to assist in gathering information for the Consolidated Plan Process. The preparation of the AI is a cooperative effort between the City and Stuart Consulting. Community Development Block Grant (CDBG) funds are being used to fund the AI and Consolidated Plan.

Two public meetings were sponsored by the City and Stuart Consulting on November 18, 2019 and February 19, 2020 to discuss the Consolidated Plan and AI process and the importance of community involvement in the preparation of both documents. Those stakeholders attending the meetings included:

- Hands of Hope
- Regional Housing Authority
- Sutter-Yuba Homeless Consortium
- CVHAP
- FREED
- Habitat for Humanity
- Bridges 2 Housing

RESERVED FOR PUBLIC COMMENTS.

The third and final public participation meeting is anticipated to be held in mid-June 2020 before the City Council for final approval and adoption of the City's 2020 AI and Consolidated Plan. For further information on the public participation process, please see the City's 2020 Consolidation Plan.

The process for the preparation of the Analysis of Impediments to Fair Housing Choice is to identify impediments in the Public and Private sectors of the community where they may exist or any actions, omissions or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restricts housing choices or the availability of housing choice, or any actions, omissions, or decisions that can have this effect.

The goals of the AI are to: (1) create an ongoing process for the examination of fair housing in the City and the elimination of housing discrimination in the jurisdiction; (2) build working relationships among the various agencies involved with housing provision, both public and private; (3) provide opportunities for racially and ethnically inclusive patterns of housing occupancy; (4) promote housing that is physically accessible to and used by all persons, particularly persons with disabilities; and (5) educate both the public and private sector on the need for benefits of public housing.

During the AI process Stuart Consulting carried out an electronic mail, telephonic and web-based research effort to Local, State, and Federal Agencies to secure any data required by HUD regarding identification of any type of fair housing complaints or issues that may adversely affect fair housing choice in the City.

A. Impediments Identified

Based on information obtained from California Rural Legal Assistance (CRLA), they identified discrimination related to disability, race and familial status in Yuba City.

B. Actions to Address Impediments

The City shall continue to work with CRLA to provide fair housing training workshops in order to educate landlords and residents regarding fair housing laws and further the goals of fair housing in the community.

II. JURISDICTIONAL BACKGROUND

A. Demographic Data

Beginning in 2005, the U.S. Census Bureau began the American Community Survey (ACS) which is a new nationwide survey designed to provide communities a look at how they are changing. Based upon a geographic area's population, the ACS collects and produces population and housing information on either an annual, 3-year or 5-year basis instead of every ten years.

Geographic areas such as the City of Yuba City will receive data estimates every 5 years. The current estimates are based on data collected by ACS between 2013 and 2017, hereon referred to as the 2013-2017 ACS data.

The 2013-2017 ACS determined that families made up 72% of the households in the City while non-family households made up 28% of all households in the City. Most of the non-family households were people living alone, but some were composed of people living in households in which no one was related to the householder. The average household size is 2.93.

Current estimates on ethnicity from ACS data is as follows:

ETHNICITY	POPULATION	PERCENTAGE
White	43,777	66.1
Black	1,788	2.7
American Indian and Alaskan Native	596	0.9
Asian	12,517	18.9
Native Hawaiian/Pacific Islander	331	0.5
Some Other Race	2,914	4.4
Two or More Races	4,371	6.6
Total Population	66,294	100%

According to the 2013-2017 ACS data, 27% of the people currently living in the City are foreign born and 73% are native to the United States; including 57% who were born in California.

There is no current ACS data on the predominant language spoken at home; however,

the 2013-2017 ACS does report that among people at least five years old living in the City 41.1% spoke a language other than English at home; 21% spoke Spanish, 41.1% spoke some other language and 18.3% reported that they speak English less than "very well."

According to the 2013-2017 ACS data estimates, the predominant language spoken at home in the City is as follows:

LANGUAGE	YUBA CITY	CALIFORNIA
English	58.9%	56%
Spanish	21%	28.7%
Asian Pacific Islander	3.3%	9.9%
Other Indo-European	16.7	4.4
Other	0.1%	1%

B. Income Data

According to the 2013-2017 ACS data income estimates, the median household income in the City is \$51,037; lower than the California average of \$67,169. The estimated percentage of households falling into specific income categories, according to the 2013-2017 ACS data, for the City and California are displayed in the following table:

INCOME	YUBA CITY	CALIFORNIA
Less than \$10,000	5%	5.4%
\$10,000 to \$14,999	6.4%	4.7%
\$15,000 to \$24,999	11.1%	8.6%
\$25,000 to \$34,999	11.5%	8.3%
\$35,000 to \$49,999	15%	11.4%
\$50,000 to \$74,999	19.1%	16.3%
\$75,000 to \$99,999	11.3%	12.2%
\$100,000 to \$149,999	12.8%	15.7%
\$150,000 to \$199,999	5.2%	7.8%
\$200,000 or more	2.5%	9.7%
Total	99%	100.1%

The 2013-2017 ACS data reports that 15% of the people currently living in the City are below the poverty level; slightly higher than the California estimate of 12.8%.

C. Employment Data

The percentage of workers by type of employment for the City's and California's civilian

population 16 years of age and older as reported by the 2013-2017 ACS data estimates is as follows:

CLASS OF WORKER	YUBA CITY	CALIFORNIA
Private wage & salary workers	76.7%	78.2%
Government workers	17.1%	13.5%
Self-employed workers	5.6%	8.1%
Unpaid family workers	0.6%	0.2%
Total	100%	100%

The same 2013-2017 ACS data on industry sectors for the employed population, 16 years and older, states that the leading industries in the City were: (1) Educational services, health care and social assistance jobs comprising 21.6% of the industry sector; and (2) Retail trade comprising 11.9% of the industry sector. The following table illustrates how the industries in the City compare to those statewide.

TYPE OF INDUSTRY	YUBA CITY	CALIFORNIA
Agriculture, forestry, fishing and hunting, & mining	9.3%	2.3%
Construction	7.9%	6.1%
Manufacturing	6.7%	9.5%
Wholesale trade	3.1%	3.0%
Retail trade	11.9%	10.8%
Transportation & warehousing, & utilities	5.7%	5.0%
Information	0.9%	2.9%
Finance and insurance, & real estate & rental & leasing	4.5%	6.2%
Professional, scientific, & management, & administrative & waste management services	7.9%	13.2%
Educational services, & health care & social assistance	21.6%	20.9%
Arts, entertainment, & recreation, & accommodation, & food services	10.4%	10.4%
Public administration	6.1%	4.4%
Other Services	4.0%	5.3%
Total	100%	100%

The 2013-2017 ACS estimates reports that 11.7% of the City's current civilian population is unemployed, much higher than the California estimate of 4.8%.

D. Education

According to 2013-2017 ACS data on education for persons 25 years and older living in the City: (1) 25% had graduated from high school; (2) 11.2% had an associate degree; (3) 12.1% had a bachelor's degree; (4) 5.2% had a graduate degree; and (5) 21.3% were dropouts who were not enrolled in school and had not graduated from high school.

The table below illustrates how the City's residents compare to statewide percentiles on educational attainment.

EDUCATION ATTAINMENT	YUBA CITY	CALIFORNIA
Graduate/Professional Degree	5.2%	11%
Bachelor's Degree	12.1%	18%
Associate's Degree	11.2%	8%
Some College, no Degree	25.1%	21%
High School Diploma or Equivalency	25%	22%
Less than High School Diploma	21.3%	20%
Total	100%	100%

The State Employment Development Department (EDD) works in coordination with the Career Training and Education Center (CTEC) and Sutter County One-Stop to offer programs to assist local businesses and job seekers with employment support and provide job seekers with the assistance they need to improve their job skills.

The CTEC opened its doors in March of 1984 and is the local one-stop job center for Sutter County which is located in central Yuba City close to public transportation. CalWORKs and CTEC are partners in both training and assistance for those entering the labor market. CTEC has contracted to provide a four-week intensive employment training, work experience and community service program.

From the beginning, the ultimate goal of the CTEC concept has been to empower individual self-sufficiency through education, training, jobs and partnerships with the community, employers and agencies to provide increased opportunities for success. CTEC is working toward redefining the educational process and has made every effort to be accessible to the schedules of individuals who have daytime obligations by providing many evening classes.

III. EVALUATION OF JURISDICTION'S CURRENT FAIR HOUSING LEGAL STATUS

A. Fair Housing Complaints or Compliance Reviews

1. HUD Compliance Review

According to the City and the Regional Housing Authority there have been no Fair Housing Compliance Reviews conducted by HUD in the last five years.

2. Fair Housing Complaints

According to the City and the Regional Housing Authority there have been no HUD findings of discrimination. One Fair Housing complaint was filed against the Housing Authority but it was determined by HUD to be unfounded.

IV. ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

A. Analysis of Public Sector

1. Zoning and Site Selection

The placement of new and rehabilitated housing for lower-income households is one of the most controversial issues communities face. If fair housing objectives are to be achieved, the goal must be to avoid high concentrations of low-income housing. The City utilizes the specific plan model for planning and development of affordable housing to ensure that affordable housing is dispersed throughout the City to avoid high concentrations of low-income housing. The City also utilizes a Planned Development Overlay to allow greater flexibility in decreasing lot sizes and setback requirements, up to the maximum levels specified by the General Plan, in order to promote residential cluster developments, which allows for greater housing production at lower costs. Most of the community's proposed affordable housing is located near or on public transportation routes and within walking distance to schools and shopping.

Local government policies that limit or exclude group homes or other housing for homeless persons from certain residential areas may violate the provisions of the Fair Housing Act. This is because they may indirectly discriminate against persons with disabilities and minorities, many of whom are homeless. The City's 2013-2021 General Plan Housing Element provides an analysis of its zoning and site selection policies and was certified by the California Department of Housing and Community Development (HCD) to be in substantial compliance with Housing Element Law.

To avoid discrimination of unrelated individuals living together, the City defines a family as one or more persons occupying a residence and living as a single housekeeping unit as distinguished from a group occupying a board house or hotel.

2. City Housing Programs

The City operates affordable housing programs funded by State HOME, CalHome, Low Income Housing Tax Credits and Community Development Block Grant Program to provide Housing Rehabilitation and First Time Homebuyer loans to increase and preserve the City's supply of affordable housing.

The City's Housing Rehabilitation Program provides zero-interest loans to qualified homeowners of residential property located in the City. Special consideration is given to households on fixed incomes, particularly the elderly and disabled. The applicant must: (1) occupy the property as their principal residence; (2) have title to the property; and (3) have household income that does not exceed the low-income guidelines established by the U.S. Department of Housing and Urban Development. The loan is due and payable upon sale, transfer of title or when the borrower no longer occupies the home as their principal residence, whichever occurs first.

Repairs may include roofing, pest control work, plumbing, electrical, flooring, painting and some types of general property improvements. Energy conservation work, like weather-stripping and insulation are encouraged. Improvements such as pools, spas and interior decorating are not eligible.

The City's First Time Homebuyer Program assists low-income, first-time homebuyers who can qualify for a first mortgage. The City provides a silent-second loan at 3% interest, payments are deferred for 30 years. The homebuyer is required to have a minimum 3% down payment. The homebuyer must maintain the home as their principal residence. The loan is due and payable upon sale, transfer of title or change in use, whichever occurs first.

The City's Housing Rehabilitation and First Time Homebuyer Programs are operated by the Regional Housing Authority. The City and its subcontractor comply with all Fair Housing laws.

3. Municipal and Other Services

Municipal and other services provided by the City such as Parks and Recreation Programs, Police and Fire services, Water, Garbage and Sewer services, Street Maintenance and Transportation Services, are all delivered equitably throughout the community.

According to the City's Public Works Department all areas of the City are serviced equitably related to Capital Improvement Projects and Replacement Projects. Additionally, maintenance services to the City's infrastructure systems including water, sewer, storm drainage systems and street and sidewalk maintenance are also provided equitably to all areas of the City.

The City seeks to reduce crime on a citywide basis. The City's Police Department's Community Policing Coordinator works with various Divisions within the Department to provide the following services to the Community and City residents:

- Public presentations to schools, civic groups and organizations are available free of charge; and
- Tours of the Police facility are given to the public by appointment only. The largest groups of tours are given to school-aged children while foreign exchange students are also given the opportunity to learn about the American Police services.
- Individuals can request and participate in ride-a-longs with Patrol Officers.
- The Police Department conducts periodic child safety seat inspections and provides training on the proper installation for child safety seats.
- The Traffic Division conducts bicycle safety rodeos at area schools.
- Residents can register for vacation checks while they are out of town.
- Department volunteers conduct voice checks on at-risk senior citizens with no one else to monitor their well-being.
- The Department offers self-defense courses for women.
- The Department provides active shooter response training specific to schools and businesses.

The Department offers the Citizen Police Academy, a 12-week academy held in the spring and fall each year. Each week, members of the Police Department or the Sutter County District Attorney's office give specialized presentation to teach attendees about the inner workings of the Department; including everything from routine activities to the specialized units and their responsibilities. Each three-hour class covers topics that include traffic education and enforcement, gangs, investigative procedures, narcotics and SWAT operations. The Citizen Police Academy promotes a partnership between the Police Department and the Community. Graduates of the Citizen Police Academies leave with a better understanding of law enforcement and its operations, and are given the opportunity to become Volunteers In Policing (VIP).

The School Resource Police Officer (SRO) duties are to maintain peace and order in and around the school sites within the Yuba City Unified School district and to create positive interaction between students, citizens and educators. With the addition of

another high school in the area, there are two SROs in the Police Department. One SRO maintains an office on the Yuba City High School campus while the other has an office at River Valley High School. Both SROs are veteran officers with extensive experience in dealing with the issues and problems that arise in local schools, whether on or off campus.

The Cadet Officer program was established by the City's Police Department to encourage and foster standards of professionalism in law enforcement for young adults interested in careers in Criminal Justice. This youth program offers the cadets interaction with positive role models, insight into Police Department operations and an understanding of the obstacles facing law enforcement today. Cadets are required to volunteer at least 16 hours per month to the Department but often devote many more. Their time is spent assisting dispatch, records and crime analysis personnel, riding with Patrol Officers, assisting with traffic control and working directly with the public. Qualified candidates for the Cadet Program are between the ages of 15 and 22, attend school full-time and maintain at least a 2.5 grade point average.

According to the City's Police Department and data from the California State Department of Justice (DOJ) hate crimes are unusual in Yuba City. During the three-year period, 2016 through 2018, Police Department records indicate one reported hate crime incident. The 2018 incident did not result in a conviction. The incident was reported to the Department of Justice. Hate crimes in the City do not appear to be an impediment to persons living and working in the community.

The Police Department's website, www.ycpd.org, features a Bulletin and News section which includes Crime Prevention Tips each month.

The City's Parks and Recreation Department offers a wide variety of classes and activities for all community members and those that are age 50 and older. An expansive number of sports programs and activities are offered throughout the week for all age groups. Support services, games, arts and creative expression classes, computer classes and lab, dance and exercise, trips and special events are offered for those 50 and older. Scholarships are available through the Rick Balfour and Mayors Cup funds for low-income children 17 and under, and seniors age 50 and older. A recent foundation grant has allowed the City to purchase ADA-accessible play equipment at Gauche Aquatic Park.

The City's Parks and Recreation Department also offers youth sport and enrichment after school programs which are located either in census tracts or school service areas that predominately contain low and moderate-income households. These programs are

for school aged children, kindergarten through eighth grade. All the programs are free to participants and funded through a variety of grants. The programs include indoor and outdoor games, art projects, entertainment, contests, supervised play and snacks. The following are a list of the host schools in the program: Andros Karperos; Park Avenue; Gray Avenue; April Lane; and Lincrest.

4. Energy Conservation

Pacific Gas and Electric assists low-income, disabled and senior citizen customers through numerous financial assistance programs and community outreach projects in the City. The following is an outline of the energy conservation and financial assistance programs offered by PG&E or non-profit agencies in the City:

LIHEAP (Low-Income Home Energy Assistance Program)

Low-income households may qualify for financial assistance via the following programs: (1) The Home Energy Assistance Program (HEAP) which provides a direct payment to an eligible client's utility bill to help offset the cost of heating or cooling their home; (2) The Weatherization Program which provides free energy efficiency upgrades to lower their monthly utility bills; and (3) The Energy Crisis Intervention Program (ECIP) provides assistance to low-income households that are in a crisis situation. Examples include a household that has received a 24 or 48-hour disconnect notice or service termination by their utility company or an energy-related crisis of life-threatening emergency exists in the applicant's household; (4) Education on basic energy efficiency practices and instruction on the proper use and maintenance of installed weatherization measures; and (5) Energy budget counseling. This program is administered by the community Resources Project, Inc. located in Yuba City.

FERA (Family Electric Rate Assistance)

FERA (Family Electric Rate Assistance) is an electric rate reduction program for large households of three or more people with low to middle-income. It provides more electric use at a lower rate and is designed for customers who exceed the income threshold for the CARE discount program.

CARE (California Alternate Rates for Energy)

The CARE Program provides a monthly discount on electric and gas bills for income qualified households or households with a member participating in a qualified public

assistance program. Income qualification is based on the number of persons living in the home and the total annual household income.

Energy Savings Assistance Program

The Energy Savings Assistance Program is a free program offered by PG&E. Energy Specialists complete an assessment of the home's energy usage to determine the type of improvements needed. Utility-approved contractors work with low-income customers to make their homes more energy efficient.

REACH (Relief for Energy Assistance through Community Help)

REACH is a one-time energy-assistance program sponsored by PG&E and administered through the Salvation Army from 170 offices in northern and central California. Those who have experienced an uncontrollable or unforeseen hardship may receive an energy credit up to \$300, with the credit amount based on the past due amount of the bill. REACH assistance may be available once within an 18-month period, but exceptions can be made for seniors, the physically challenged and the terminally ill.

Third Party Notification Program

PG&E will notify a designated third party when a person, relative, friend or client receives a late notice due to an unpaid PG&E bill. The program may benefit persons who are ill, having financial difficulties, language difficulties or other issues.

Medical Baseline Program

Customers eligible for the Medical Baseline Program receive an additional allotment of electricity and/or gas. This helps ensure that more energy to support qualifying medical devices is available at a lower rate.

5. Employment – Housing – Transportation Linkage

In order to meet the needs of public transportation to serve the region as it changes, the Board of Directors of the Sacramento Area Council of Governments (SACOG), the region's transportation planning and funding agency utilizes the Transportation/Land Use data developed during the Sacramento Region Blueprint Project.

Yuba-Sutter Transit has received regional recognition from the SACOG for outstanding regional efforts in transportation as part of the SACOG Salutes Regional Awards Program. Compared to other urban areas in California, Yuba-Sutter Transit operates what is among the widest range of services at the lowest local cost.

Through the preparation of a Specific Plan, which will govern future growth, the City has planned for the development of multifamily affordable housing along major transportation routes, to ensure the maximum number of residents shall have close access to public transportation, schools, parks, shopping, and employment opportunities.

Yuba-Sutter Transit offers scheduled local fixed route service throughout the Marysville/Yuba City Urbanized Area using a fleet of 22 local fixed route buses with seating capacities of 31 or 32 passengers. The local fixed route system operates every 30 to 60 minutes on six routes using 14 buses required for peak service. This service is provided each weekday from 6:30 a.m. to 6:30 p.m. and from 8:30 a.m. to 5:30 p.m. on Saturdays. No local fixed route service is provided on Sundays or major Holidays.

Using a fleet of 13 tour-style coaches all with seating capacities of 57 passengers, Yuba-Sutter Transit offers 23 weekday schedules (10 early morning and 10 late afternoon commute hour schedules along with three midday schedules) between Marysville/Yuba City and downtown Sacramento requiring 10 buses in peak service. Used primarily by workers in downtown Sacramento, transfer opportunities to other local and regional service providers are available in downtown Sacramento for service throughout the greater Sacramento area and beyond. No Sacramento service is provided on Sundays or major Holidays.

Dial-A-Ride offers curb-to-curb services using a fleet of 16 small buses all with seating capacities of 16 passengers to meet the needs of seniors (age 65 and over) and eligible persons with disabilities. This service operates from 6:30 a.m. to 6:30 p.m. on weekdays and from 8:30 a.m. to 5:30 p.m. on Saturdays. This same style service is available to the general public without restriction on weekday evenings from 6:00 p.m. to 9:30 p.m. No Dial-A-Ride service is available on Sundays and major Holidays.

Beginning January 13, 2020, Yuba-Sutter Transit will operate a free shuttle service between Yuba College's Sutter County Center in Yuba City and the Walton Transit Center where three local fixed routes provide transfer opportunities throughout the Marysville/Yuba City Urbanized Area. This experimental service will operate every 30 minutes from 7:35 a.m. to 6:05 p.m. on school attendance days only during Spring and Fall Semesters and from 7:35 a.m. to 4:05 p.m. during the Summer Semester.

Yuba-Sutter Transit also operates three rural routes on limited schedules between Live Oak, Wheatland, and Yuba County foothills and the Marysville/Yuba City Urbanized Area where direct transfer opportunities are available to all of the local fixed routes and several Sacramento schedules.

Since 2005, the Feather River Air Quality Management District (FRAQMD) has provided funding for a Discount Monthly Bus Pass Program initially for area youth, but it has since been expanded to also include seniors and persons with disabilities. This program discounts the regular \$15 monthly bus pass to just \$5 for unlimited use on all local fixed routes and the three rural routes. While this program is funded on an annual basis, it is expected to soon be extended at least through March 2021.

All Yuba-Sutter Transit buses are equipped with two or three bike racks and are wheelchair accessible.

For more information on Yuba-Sutter Transit local bus routes and services, visit the agency website at www.yubasuttertransit.com.

6. Housing Authority and Other Housing Programs

This section of the AI examines the following policies and procedures for the public housing agency and other housing assistance providers:

- Selection of individuals and families to receive the benefits of federal, state or local publicly assisted housing programs that provide rental or ownership opportunities for lower-income person and families;
- Advertising rental vacancies to the public and establishing and maintaining the waiting lists; and
- Assisting certificate and voucher holders to find suitable rental units throughout the jurisdiction.

There is one major assisted housing provider within the jurisdiction's project area: The Regional Housing Authority (Housing Authority), which is responsible for the Section 8 Housing Choice Voucher Program and Public Housing. Their admissions and occupancy policies for publicly owned housing are on file with the City.

There are no statements or rules in the Housing Authority's policies that could be construed as discriminatory in tenant selection, nor are there procedures which would exclude or limit the participation of persons in the housing developments they manage. The Housing Authority promotes fair housing through advertisements in the local Appeal Democrat and through the use of banners and pamphlets which are published in English and Spanish.

The tenant selection process for the Housing Choice Voucher Rental Assistance Program, (a rental subsidy program for low-income households), includes the following preferences: (1) Local Residents who live within the jurisdiction of the Housing Authority; (2) Working Preference – Families with at least one adult who is employed and has been employed for six months. This definition includes families where at least one adult was employed and is currently receiving unemployment benefits. This preference is automatically extended to elderly families or a family whose head or spouse is receiving income based on their permanent disability; (3) Member of the household is a service person or a veteran; (4) Victims of Domestic Violence within the previous six months; (5) Homeless preference for applicants in the Housing Authority's jurisdiction who are fleeing a domestic violence situation; (6) Involuntary Displacement – Displacement by Government Action; (7) Family that was terminated from a RH HCV program due to insufficient program funding; (8) Transfer from other PHA owned or managed unit/program for VAWA transfers. The selection process is

based upon points from preference selection and random lottery placement. A minimum of 75% of the HCV units must be occupied by extremely low-income persons. The current waiting list is closed and the average wait for tenant placement is up to twenty-four months. As of July 2019, the Housing Authority has 1,661 Housing Choice Vouchers.

The tenant selection process for Public Housing includes the following preferences: (1) Residents who live in Sutter, Nevada, Colusa and Yuba County; (2) Working Preference – Families with at least one adult who is employed and has been employed for six months. This definition includes families where at least one adult was employed and is currently receiving unemployment benefits. This preference is automatically extended to elderly families or a family whose head or spouse is receiving income based on their permanent disability; (3) Member of the household is a service person or a veteran; (4) Victims of Domestic Violence within the previous six months; (5) Homeless, (as verified by a professional or social service agency). Unit availability fluctuates and units are filled based upon the above criteria and size of family; therefore, the waiting time fluctuates between months to over a year. The Richland Public Housing waitlist is currently open for 0–5 bedrooms. The Date Street Senior Village and River City Manor waitlist are closed at this time.

The Housing Authority also manages the following two farm worker projects:

Richland Housing Farm Labor facility, which consists of 180 units, (50-two bedrooms, 118-three bedroom and 12-four bedroom units), constructed in the late 1970's. The Richland Housing project is targeted to farm workers who are permanent residents of Yuba City and do not migrate on a seasonal basis. The Housing Authority states that there have been no significant increases or decreases in demand for housing at Richland. As of September 2019, there are 18 families on the waiting list.

Yuba City Migrant Center includes 79 units (62-2 bedroom and 17-3 bedroom units). The Center operates seasonally between April and October. The Housing Authority previously stated there had been a decline in demand for migrant farm worker housing; however, over the past 2 years the Migrant Center has been fully occupied and has maintained a waitlist during the operational season.

The California Human Development Corporation (CHDC) owns and manages Mahal Plaza. Mahal Plaza is a 98-unit project containing two, three and four bedroom units. Mahal Plaza gives priority to resident and migrant farm workers. Mahal Plaza management states there has been an increase in demand for Mahal Plaza units; currently there are approximately 60 households on the waiting list.

Other low-income housing programs, such as the City's Housing Rehabilitation and First Time Home Buyer Programs have waiting lists based on eligibility, and date/time of application. Neither of these programs base applicant assistance on race, color, religion, sex, national origin, disability or familial status.

The City's Homes2Families Program, funded through Redevelopment Agency Set-Aside and the American Recovery and Reinvestment Act (ARRA) Neighborhood Stabilization Program (NSP), continues to provide homes that are purchased by the City, renovated and then managed by the Housing Authority. The homes are then offered to the community at an affordable rent. This program serves the City and its residents by eliminating blight in neighborhoods and by offering affordable housing to the community.

The Housing Authority states its database system does not capture racial/ethnic breakdown by Census Tract of Housing Choice Voucher Program participants. The Housing Authority does track demographic information by property codes which are by county. The Housing Authority states that tenant demographics in any assisted housing developments are reflective of the jurisdictions race/ethnic composition based on the 2010 Census data.

The Housing Authority's admissions application contains a section on the application where applicants can select a preference for one assisted housing project over another. During the application process an applicant can refuse one unit and maintain their position on the waiting list. After the first refusal of a unit, each additional rejection is reviewed on an individual basis. If an applicant is willing to accept the unit offered, but is unable to move at the time of the offer and presents clear evidence of his/her inability to move, the rejection is justifiable. If necessary, the Executive Director may approve additional waivers without the applicant going to the bottom of the waiting list.

The Housing Authority also actively promotes mobility through cooperative efforts with other agencies in the metropolitan area and region. The Housing Authority does not discourage or reject applications from lower income households that do not reside in its jurisdiction by imposing residency or other local preferences. In fact, the Housing Authority assists certificate and voucher holders from other jurisdictions. Housing Authority staff encourage certificate and voucher holders to look for housing in all neighborhoods in the jurisdiction, regardless of certificate and voucher holders' ethnicity.

There have been no HUD assisted or insured housing providers, (including the Housing Authority), that have been found in noncompliance with any civil rights laws or

regulations since the City's last Analysis of Impediments in 2010. The Housing Authority provides Fair Housing staff training every other year.

To ensure compliance and monitoring of programs, the City continues to submit performance reports and annual plans as required by HUD and by the State Department of Housing and Community Development (HCD), which administers the HOME program. The City also uses IDIS for reporting, setting up, funding and drawing down funds for its Community Development Block Grant program.

In an effort to promote fair housing, the City's Development Services Department or its administrative subcontractor provides loan counseling to all of its borrowers prior to closing on first-time homebuyer or housing rehabilitation loans. Information on fair housing is marketed to the general public through newspaper articles, City newsletters, the City's Website, at community events and with flyers available at the Community Development Services Department's front counter.

7. Low Income and Racial/Ethnic Concentrations

The areas of the City where the low-income and ethnic/racial concentrations areas overlap one another is east of Highway 99, south Queens Avenue and north of Franklin Avenue. For additional data on the areas of the City (Census Tract Block Group) where low-income and ethnic/racial concentrations exist see the City's 2020 Consolidated Plan.

8. Sale of Subsidized Housing and Possible Displacement

Based on a review with the California Housing Partnership Corporation database regarding units at risk of conversion and direct contact with property owners and management of the assisted units, no units within the City are at high risk of converting to market rate within the next five years.

Two projects, (Live Oak Apartments and Sutter Village), are owned by private, for-profit developers whose contracts for HUD Project Based Section 8 assistance are renewed annually. Both owners were contacted and expressed their intent to continue to maintain the projects as affordable. In addition, Suter Village recently received an allocation of Low Income Housing Tax Credits (LIHTC) for project rehabilitation. The LIHTC ensures affordability of Sutter Village until 2073.

According to the City's Planning Department, no units of affordable housing will be destroyed during the next five years. The City's Residential Anti-displacement and Relocation Assistance Plan adopted in 1996 closely follows the provisions of the Uniform Relocation Act when tenants of affordable housing are displaced. The Plan

includes replacement of said units within a three year time frame; establishing alternative facilities to house persons who must be temporarily displaced during rehabilitation; provision of reasonable protection of the tenants whose dwelling units are subjected to condominium conversion; and provision of HUD-funded counselors or consultants to give homeowners and renters information on the assistance available to help them remain in the neighborhoods while revitalization efforts are underway.

9. Property Tax Policies

Property tax assessments are statutorily mandated by the State of California as a means to fund government services in Sutter County and throughout the State.

In the past, the City has utilized CDGB funds, City General funds, Redevelopment funds and Transportation Enhancement Activities funds to revitalize blighted business districts.

10. Planning and Zoning Boards

The City realizes that Boards and Commissions play an important role in City government by assisting and advising the City Council in formulating and implementing policies and to develop recommendations to the City Council. Boards and commissions are established by ordinance.

The City has an open recruitment policy for Boards and Commissions where all citizens are encouraged to apply. The City Clerk is responsible for advertising vacancies on the City's website, in the Appeal Democrat, the local newspaper and Social Media.

The City has no policies or practices affecting the representation of all racial, ethnic, religious, and disabled segments of the community on Boards and Commissions.

11. Building Codes (Accessibility)

The City has adopted the California Building and Fire Codes and the California Energy Efficiency Standards as the basis of its building standards. The City has also adopted the Uniform Code for the Abatement of Dangerous Buildings and the International Property Maintenance Code. Permits are required for all electrical and plumbing work and other major home improvements and modifications. The City also requires the installation of sprinklers for all single-family and multi-family developments.

The City's building codes represent basic construction standards within the State of

California and do not place additional undue financial burdens on contractors who construct or rehabilitate units of affordable housing.

It is the policy of the City to do whatever possible to assist persons with disabilities to have access to housing. The City's 2013-2021 General Plan Housing Element is certified by the State Housing and Community Development Department to have no negative zoning or regulatory policies relating to the accommodations for persons with disabilities.

Building code standards are upheld through code enforcement. Code enforcement activities strive to promote and maintain a safe living environment and address building condition issues before they progress to the point of requiring more extensive repairs. The City's Code Enforcement Officer operates a fair and unbiased enforcement program to inspect properties that may represent hazardous and/or dangerous building conditions. In the past five years, all code enforcement violations have been corrected through compliance measures and no housing units have been destroyed.

B. Analysis of Private Sector

1. Lending Practices

The Home Mortgage Disclosure Data (HMDA) was enacted by Congress in 1975 and was implemented by the Federal Reserve Board's Regulation C. On July 21, 2011, the rule writing authority of Regulation C was transferred to the Consumer Financial Protection Bureau (FPB). This regulation provides the public loan data that can be used to assist:

- In determining whether financial institutions are serving the housing needs of their communities.
- Public officials in distributing public sector investments so as to attract private investment to areas where it is needed; and
- In identifying possible discriminatory lending patterns.

This regulation applies to certain financial institutions, including banks, savings associations, credit unions and other mortgage lending institutions.

HMDA data includes the disposition of applications for mortgage credit during each

calendar year, the location of the properties related to those loans, and personal demographic and other information about the borrowers. Each September, the Federal Financial Institutions Examination Council (FFIEC) releases summary data pertaining to lending activity from the previous calendar year; therefore, the most current HMDA data available for analysis is for calendar year 2018.

Using the loan data submitted by these financial institutions, the FFIEC creates aggregate tables for each metropolitan statistical area (MSA) or metropolitan division (MD), (where applicable), and individual institution disclosure reports. The aggregate tables and individual disclosure reports for calendar years 1999 – 2014 are available on this website, www.ffiec.gov/hmda or also on the FFIEC website www.ffiec.gov/reports.htm. Furthermore, the FFIEC provides to the public a few other data products, including TS (Transmittal Sheet) and LAR (Loan application Register) raw data software and Census data on the website.

The tables on the next page depict the City's 2018 Income and HMDA data by census tract. The tables show the number of loans originated and denied per census tract according to the borrower's median household income and minority population. According to HUD, the City's median household income for a family of four in 2019 was \$59,500.

The City's 2018 Income and HMDA data in the tables on the following pages indicate that some loan denials occurred in census tracts where the minority populations were comparatively low and/or median income was comparatively higher than other areas of the City. For instance, in census tract 506.03 where applicants earn 168.8% of the median household income and the minority population is at 30.29%, you might expect the denial rate to be much lower instead of the highest in the City where 12.5% of loan applications were denied. After analysis of the statistics in the tables, there exists no clear pattern of loan discrimination in census tracts based upon high concentrations of low-income households and/or minorities.

LOANS DENIED BY INCOME LEVEL						
Census Tract	>50% of MSA/MD Median	50-79% of MSA/MD Median	80-99% of MSA/MD Median	100-119% of MSA/MD Median	120% or more of MSA/MD Median	TOTAL
050101	4	12	5	8	15	44
050102	4	4	7	2	0	17
050201	4	8	9	0	8	29
050202	4	8	2	0	9	23
050301	1	5	1	3	6	16
050302	3	14	2	5	6	30
050401	6	11	5	8	11	41
050402	5	9	5	8	19	46
050403	5	6	7	5	14	37
050501	6	9	8	3	13	39
050503	5	13	20	7	34	79
050504	6	7	14	8	29	64
050601	4	3	16	12	19	54
050603	2	25	8	5	40	80
050604	1	3	4	7	25	40
TOTAL	60	137	113	81	248	639

Categories included within the "denied" applications in the table above include: (1) Application Approved but Not Accepted; (2) Application Denied; (3) Application Withdrawn By Applicant; and (4) Filed Closed for Incompleteness.

LOANS APPROVED BY INCOME LEVEL					
					120% or more of
					of

Census Tract	>50% of MSA/MD Median	50-79% of MSA/MD Median	80-99% of MSA/MD Median	100-119% of MSA/MD Median	MSA/MD Median
050101	8	15	17	10	39
050102	8	13	11	11	8
050201	5	14	6	4	6
050202	4	16	3	2	3
050301	0	3	6	6	22
050302	7	12	9	8	3
050401	5	22	15	17	35
050402	2	8	11	9	38
050403	5	5	18	10	34
050501	2	8	11	8	14
050503	9	17	15	14	42
050504	4	14	36	12	36
050601	7	11	21	15	58
050603	3	14	9	14	54
050604	3	10	5	9	36
TOTAL	72	182	193	149	428

After reviewing loan denials by race and Hispanic ethnicity by census tracts for the City in the following table, the largest percentage difference spread occurred with loans where Hispanic applicants were denied 19% more often citywide. Otherwise, the data above does not present any conclusive evidence of loan discrimination based on race in the City.

LOANS DENIED - RACE/HISPANIC BY CENSUS TRACTS

Census Tract	050101	050102	050201	050202	050301	050302	050401	050402	050403	050501	050503	050504	050601	050603	050604
White	22	11	21	13	13	21	25	26	18	21	35	30	37	53	28
Black or African American	2	1	0	0	0	1	1	2	1	0	1	0	0	0	1
Asian	9	0	1	2	1	2	4	8	9	9	27	20	4	11	1
American Indian or Alaskan Native	1	0	0	0	1	1	0	1	0	0	1	0	1	4	0
Native Hawaiian or Pacific Islander	0	0	0	0	0	0	0	0	0	0	2	0	0	0	3
Two or More Minority Races	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Joint	1	0	1	1	0	1	2	0	2	2	1	0	1	1	3
Race Not Available	8	5	6	7	1	4	9	9	7	7	12	14	11	11	4
Hispanic or Latino (Ethnicity)	7	11	3	2	7	8	9	5	3	5	9	10	4	12	8

2. Access to Insurance

On April 26, 2003, the California Supreme Court decided that the State must collect and disclose to the public the data it has collected from insurance companies to determine whether insurers are engaged in discrimination against consumers based on their race, income, or the ZIP code where they live. Insurers are now required to file certain basic data with the California State Department of Insurance to verify whether an insurer is violating prohibitions against redlining.

The most recent 2015 Insurance Commissioner's Report on underserved communities in California does not identify the City of Yuba City as "underserved" for home, personal auto, commercial peril or fire market insurances. Whether a community is considered to be "underserved" is based upon three criteria contained in the California Code of Regulations section 2646.6(c) (1) (a-c) as follows:

- a. The proportion of uninsured motorists is ten percentage points above the statewide average;
- b. The per capita income of the community, as measured in the most recent U.S. Census, is below the fiftieth percentile for California; and
- c. The community, as measure in the most recent U.S. Census, is predominantly minority.

Communities that are considered "underserved" are those with little or no insurance protection. Absence of or inadequate insurance protection can be detrimental to people's lives; therefore, the California Department of Insurance will continue to encourage the insurance industry to invest and to make insurance accessible and affordable to the "underserved" communities.

3. Real Estate Practices

All Realtors in California are required to sign the National Association of Realtors Code of Ethics at time of licensing and are required to attend a three-hour course on ethics prior to their license renewal every four years. Ethics violations, including those associated with racial steering, illegal advertising practices, discrimination by race, discrimination against racially integrated neighborhoods, or discrimination against low income neighborhoods are reported to the Sutter Yuba Association of Realtors (SYAOR) and are directed to the association's ethics tribunal for investigation. According to the Executive Officer of Sutter/Yuba Association of Realtors, since her employment began 20 years ago, there have been no complaints of discriminatory practices reported to

the Association.

In further discussions with the SYAOR Executive Officer, Realtors are also required to have an additional 42.5 hours of continuing education every four years to renew their licenses. SYAOR regularly and routinely offers classes on various subjects related to real estate practices for their members and affiliated lender members. All new Realtor members of SYAOR are required to attend a New Member Orientation which includes information on Fair Housing. During the Orientation sessions, the members watch videos pertaining to Fair Housing. According to the Executive Officer of SYAOR, the association is a tight knit organization that would have knowledge of unfair or discriminatory lending practices to minorities and low-income households (higher points, interest rates, fees, subprime rates) and unfair appraisal practices associated with minorities or low-income households. The Executive Officer of SYAOR has no knowledge of any unfair or illegal rental, sales, or lending practices against minorities and low-income households in Yuba City.

C. Public and Private Sector

1. Fair Housing Enforcement

Fair Housing complaints brought to the City's attention are directed to California Rural Legal Assistance (CRLA); California Department of Fair Employment & Housing and/or Department of Housing & Urban Development (HUD).

CRLA advocates and provides a wide variety of legal services on behalf of migrant workers and low-income persons in Sutter, Yuba and Colusa counties, including City residents. Unfortunately, CRLA states their office is limited in the services they can provide due to staffing constraints and turn away more than half of eligible individuals that request their services.

CRLA reports the largest number of complaints related to Fair Housing are disability discrimination, followed by race and familial status discrimination. CRLA may assist the resident in the house, provide self-help assistance or refer them to the State or Federal agencies noted above.

In the past, the City has worked with CRLA by providing CDBG funding to hold fair housing training workshops and further the goals of fair housing in the community.

2. Informational Programs

The Housing Authority promotes fair housing through advertisements in the local newspaper, the use of fair housing banners, and pamphlets published in English,

Spanish and Punjabi.

Information on fair housing and events are marketed to the general public through brochures, newspaper articles, City newsletters, the City Website and at community events.

D. Fair Housing and Equal Opportunity

According to the City and Housing Authority there have been no determinations of unlawful housing discrimination by a court or a finding of noncompliance by HUD under Title VI of the Civil Rights Act of 1964 or Section 504 of the Rehabilitation Act of 1973.

V. ASSESSMENT OF PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS AND ACTIVITIES

The City's General Plan 2013-2021 Housing Element describes the housing programs and activities recently and currently underway promoting fair housing. As reported in the Housing Element, the housing programs and activities have served and continue to serve the community well. The City plans to continue those programs and activities throughout the 8-year General Plan Housing Element Planning Cycle. For specific information on these housing programs and activities, including farm worker housing, please refer to the City's 2013-2021 Housing Element at https://www.yubacity.net/city_hall/departments/development_services/housing_c_d_b_g/housing_element.

VI. CONCLUSIONS

A. Public Sector

After a review of local laws and ordinances relating to the possible impediments to fair housing choice in the public sector, the City has no knowledge of impediments of the following nature:

- Local building, occupancy and health and safety codes that may affect the availability of housing for minorities, families with children, and persons with disabilities;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of public (assisted) and private housing such as: the provision of essential municipal services (e.g., water, sewage, electricity, public transportation, roads);

- Real estate property tax assessments;
- Building codes;
- Accessibility standards that do not meet the accessibility requirements of the Fair Housing Act (42 U.S.C. 3604, Section 804(f)(3)(C));
- Equalization of municipal services;
- Local zoning laws and policies (e.g., minimum lot size requirements, dispersal requirements for housing facilities for persons with disabilities in single-family zones, and restrictions on the number of unrelated persons in dwellings based on size of unit or number of bedrooms);
- Demolition and displacement decisions pertaining to assisted housing and the removal of slums and blight (e.g., relocation policies and practices affecting persons displaced by urban renewal, revitalization, and /or private commercialization or gentrification in low-income neighborhoods);
- Public policies that restrict the provision of housing and community development resources to areas of minority concentration, or policies that inhibit the employment of minority persons and individuals with disabilities;
- Public policies that restrict the interdepartmental coordination between other local agencies in providing housing and community development resources to areas of minority concentration or to individuals with disabilities;
- Planning, financing, and administrative actions related to the provision and siting of public transportation and supportive social services that may inhibit or concentrate affordable housing opportunities for persons with disabilities; and
- Policies and practices affecting the representation of all racial, ethnic, religious, and disabled segments of the community on planning and zoning boards and commissions.

B. Private Sector

After a review of local laws and ordinances relating to the possible impediments to fair housing choice in the private sector, the City has no knowledge of impediments of the following nature:

- Real Estate practices concerning steering or blockbusting, deed

restrictions, Trust or lease provisions, conversions of apartments to all-adult, or inaccessible design;

- Property management firms' "occupancy quotas";
- Banking and insurance policies and practices pertaining to the financing, sale, purchase, rehabilitation, and rental of housing that may affect the achievement of fair housing choice within the jurisdiction; or
- The discriminatory provision of Realtor services.

VII. RECOMMENDATION

1. The City should continue to work with California Rural Legal Assistance to educate the community on fair housing laws and promote fair housing choice through brochures, the City's Website, Social Media and at community events.
2. After the review of local laws and ordinances relating to the possible impediments to fair housing choice in the public and private sector, the City should continue to operate as usual.

VIII. SIGNATURE FOR ADOPTION

I certify that the attached Analysis of Impediments to Fair Housing has been reviewed and adopted by the City Council of the City of Yuba City.

City Manager Date

ATTACHMENT 4

Quick Guide to CDBG Eligible Activities to Support Coronavirus and Other Infectious Disease Response

REVISED April 6, 2020

Grantees should coordinate with local health authorities before undertaking any activity to support state or local pandemic response. Grantees may use Community Development Block Grant (CDBG) funds for a range of eligible activities that prevent and respond to the spread of infectious diseases such as the coronavirus.

Examples of Eligible Activities to Support Coronavirus and Other Infectious Disease Response

<i>For more information, refer to applicable sections of the Housing and Community Development Act of 1974 (for State CDBG Grantees) and CDBG regulations (for Entitlement CDBG grantees).</i>	
Buildings and Improvements, Including Public Facilities	
Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements. <i>See section 105(a)(2) (42 U.S.C. 5305(a)(2)); 24 CFR 570.201(c).</i>	Construct a facility for testing, diagnosis, or treatment.
	Rehabilitate a community facility to establish an infectious disease treatment clinic.
	Acquire and rehabilitate, or construct, a group living facility that may be used to centralize patients undergoing treatment.
Rehabilitation of buildings and improvements (including interim assistance). <i>See section 105(a)(4) (42 U.S.C. 5305(a)(4)); 24 CFR 570.201(f); 570.202(b).</i>	Rehabilitate a commercial building or closed school building to establish an infectious disease treatment clinic, e.g., by replacing the HVAC system.
	Acquire, and quickly rehabilitate (if necessary) a motel or hotel building to expand capacity of hospitals to accommodate isolation of patients during recovery.
	Make interim improvements to private properties to enable an individual patient to remain quarantined on a temporary basis.
Assistance to Businesses, including Special Economic Development Assistance	
Provision of assistance to private, for-profit entities, when appropriate to carry out an economic development project. <i>See section 105(a)(17) (42 U.S.C. 5305(a)(17)); 24 CFR 570.203(b).</i>	Provide grants or loans to support new businesses or business expansion to create jobs and manufacture medical supplies necessary to respond to infectious disease.
	Avoid job loss caused by business closures related to social distancing by providing short-term working capital assistance to small businesses to enable retention of jobs held by low- and moderate-income persons.
Provision of assistance to microenterprises. <i>See section 105(a)(22) (42 U.S.C. 5305(a)(22)); 24 CFR 570.201(o).</i>	Provide technical assistance, grants, loans, and other financial assistance to establish, stabilize, and expand microenterprises that provide medical, food delivery, cleaning, and other services to support home health and quarantine.

Provision of New or Quantifiably Increased Public Services	
<p>Following enactment of the CARES Act¹, the public services cap² has no effect on CDBG-CV grants and no effect on FY 2019 and 2020 CDBG grant funds used for coronavirus efforts.</p> <p><i>See section 105(a)(8) (42 U.S.C. 5305(a)(8)); 24 CFR 570.201(e).</i></p>	Carry out job training to expand the pool of health care workers and technicians that are available to treat disease within a community.
	Provide testing, diagnosis or other services at a fixed or mobile location.
	Increase the capacity and availability of targeted health services for infectious disease response within existing health facilities.
	Provide equipment, supplies, and materials necessary to carry-out a public service.
	Deliver meals on wheels to quarantined individuals or individuals that need to maintain social distancing due to medical vulnerabilities.
Planning, Capacity Building, and Technical Assistance	
<p>States only: planning grants and planning only grants.</p> <p><i>See section 105(a)(12).</i></p>	Grant funds to units of general local government may be used for planning activities in conjunction with an activity, they may also be used for planning only as an activity. These activities must meet or demonstrate that they would meet a national objective. These activities are subject to the State's 20 percent administration, planning and technical assistance cap.
<p>States only: use a part of to support TA and capacity building.</p> <p><i>See section 106(d)(5) (42 U.S.C. 5306(d)(5)).</i></p>	Grant funds to units of general local government to hire technical assistance providers to deliver CDBG training to new subrecipients and local government departments that are administering CDBG funds for the first time to assist with infectious disease response. This activity is subject to the State's 3 percent administration, planning and technical assistance cap.
<p>Entitlement only: data gathering, studies, analysis, and preparation of plans and the identification of actions that will implement such plans. <i>See 24 CFR 570.205.</i></p>	Gather data and develop non-project specific emergency infectious disease response plans.

Planning Considerations

Infectious disease response conditions rapidly evolve and may require changes to the planned use of funds:

- CDBG grantees must amend their Consolidated Annual Action Plan (Con Plan) when there is a change to the allocation priorities or method of distribution of funds; an addition of an activity not described in the plan; or a change to the purpose, scope, location, or beneficiaries of an activity (24 CFR 91.505).
- If the changes meet the criteria for a “substantial amendment” in the grantee’s citizen participation plan, the grantee must follow its citizen participation process for amendments (24 CFR 91.105 and 91.115).
- Under the CARES Act, CDBG grantees may amend citizen participation and Con Plans concurrently in order to establish and implement expedited procedures with a comment period of no less than 5-days.

Resources

The Department has technical assistance providers that may be available to assist grantees in their implementation of CDBG funds for activities to prevent or respond to the spread of infectious disease. Please contact your local CPD Field Office Director to request technical assistance from HUD staff or a TA provider.

- Submit your questions to: CPDQuestionsAnswered@hud.gov
- Coronavirus (COVID-19) Information and Resources: <https://www.hud.gov/coronavirus>
- CPD Program Guidance and Training: <https://www.hudexchange.info/program-support/>

¹ On March 27, 2020, President Trump approved the Coronavirus Aid, Relief, and Economic Security Act (Public Law 116-136) (CARES Act). The CARES Act makes available \$5 billion in CDBG coronavirus response (CDBG-CV) funds to prevent, prepare for, and respond to coronavirus.

² Section 105(a)(8) of the HCD Act caps public service activities at 15 percent of most CDBG grants. Some grantees have a different percentage cap.

ATTACHMENT 5

RESOLUTION NO. _____

**RESOLUTION OF THE CITY COUNCIL OF THE CITY OF YUBA CITY
APPROVING THE 2020-2024 CONSOLIDATED PLAN, 2020-2021 ANNUAL ACTION PLAN,
AND ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE, CERTIFYING
COMPLIANCE WITH THE REQUIREMENTS OF THE CDBG PROGRAM, AND
AUTHORIZING STAFF TO SUBMIT ALL APPROVED DOCUMENTS TO THE DEPARTMENT
OF HOUSING AND URBAN DEVELOPMENT**

WHEREAS, the Department of Housing and Urban Development has determined that the City of Yuba City will receive \$666,861 under program year 2020-2021 of the Housing and Community Development Act of 1974, as amended; and

WHEREAS, the City of Yuba City held a public meeting on February 19, 2020, as well as a public hearing on August 18, 2020, to consider public comments and proposals regarding the 2020-2024 Consolidated Plan, 2020-2021 Annual Action Plan, and Analysis to Impediments of Fair Housing Choice, the community development objectives and the projected use of CDBG funds contained therein; and

WHEREAS, the City of Yuba City has provided the citizens with an opportunity to review and comment on concerns involving the amount of funds available for proposed community development and housing activities, the range of activities that may be undertaken and other important program requirements, and provided citizens with adequate opportunity to participate in the development of the 2020-2024 Consolidated Plan, 2020-2021 Annual Action Plan, and Analysis to Impediments of Fair Housing Choice, including any revisions, changes or amendments thereto for a 30-day period commencing on May 15, 2020 and ending on June 16, 2020.

NOW, THEREFORE, be it resolved by the City Council of the City of Yuba City that the 2020-2024 Consolidated Plan, 2020-2021 Annual Action Plan, and Analysis to Impediments of Fair Housing Choice, is hereby approved, that the City Manager is authorized to execute all documents related thereto, and that staff is authorized to submit all documents to the United States Department of Housing and Urban Development.

The foregoing resolution was duly and regularly introduced, passed, and adopted by the City Council of the City of Yuba City at a regular meeting thereof held on August 18, 2020, by the following vote:

AYES:

NOES:

ABSENT:

Shon Harris, Mayor

ATTEST:

Patricia Buckland, City Clerk

APPROVED AS TO FORM
COUNSEL FOR YUBA CITY:

Shannon Chaffin, City Attorney
Aleshire & Wynder, LLP

ATTACHMENT 6

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- Preapplication
 Application
 Changed/Corrected Application

*** 2. Type of Application:**

- New
 Continuation
 Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

CA64176 YUBA CITY

5b. Federal Award Identifier:

B-20-MC-06-0036

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Yuba City

* b. Employer/Taxpayer Identification Number (EIN/TIN):

94-6000460

* c. Organizational DUNS:

08218192

d. Address:

* Street1:

1201 Civic Center Blvd.

Street2:

* City:

Yuba City

County/Parish:

Sutter

* State:

CA: California

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

95993

e. Organizational Unit:

Department Name:

Development Services

Division Name:

Housing

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mrs.

* First Name:

Jaspreet

Middle Name:

* Last Name:

Kaur

Suffix:

Title:

Housing Analyst

Organizational Affiliation:

* Telephone Number:

(530) 822-3233

Fax Number:

(530) 822-7575

* Email:

jkaur@yubacity.net

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant/Entitlement Grants

*** 12. Funding Opportunity Number:**

[Redacted]

* Title:

[Redacted]

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Properties located within the City Limits of Yuba City, CA.

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Funds to benefit low and moderate-income individuals and families citywide and on a targeted basis in accordance with the adopted 2020-2021 Annual Action Plan.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="666,861.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="\$666,861.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

**** I AGREE**

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ATTACHMENT 7

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.





PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE 
APPLICANT ORGANIZATION 	DATE SUBMITTED 

ATTACHMENT 8

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative

agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants, and contracts under grants, loans, and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official Date

_____ Diana Langley August 18, 2020
Title: Interim City Manager

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2020 , _____ , _____ (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such

persons during the designated period;

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing: 1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.

Signature/Authorized Official Date

_____ Diana Langley August 18, 2020
Title: Interim City Manager

**OPTIONAL CERTIFICATION
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature/Authorized Official Date

_____ Diana Langley August 18, 2020
Title: Interim City Manager

Specific HOME Certifications

THIS DOES NOT APPLY AS THE CITY IS NOT A DIRECT RECIPIENT OF HOME FUNDS

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature/Authorized Official Date

Title

ESG Certifications

THIS DOES NOT APPLY AS THE CITY IS NOT A RECIPIENT OF ESG FUNDS

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in

obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction's consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately

resulting in homelessness for these persons.

Signature/Authorized Official Date

Title

HOPWA Certifications

THIS DOES NOT APPLY AS THE CITY IS NOT A RECIPIENT OF HOPWA FUNDS

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature/Authorized Official Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.